

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF IOWA  
CENTRAL DIVISION

LIGURIA FOODS, INC.,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 3:14-CV-3041-MWB
	)	
GRIFFITH LABORATORIES, INC.,	)	<b>FINAL PRETRIAL ORDER</b>
	)	
Defendant.	)	

This final pretrial order was entered after a final pretrial conference held on April 17, 2017.

The court expects the parties to comply fully with this order.

The following counsel, who will try the case, appeared at the conference:

1. For Plaintiff:

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**I. STIPULATION OF FACTS:** The parties agree that the following facts are true and undisputed:

1. Plaintiff, Liguria Foods, Inc. (“Liguria Foods”) is a pepperoni and dry sausage manufacturer with its principal place of business in Humboldt, Iowa, with its most popular pepperoni product called “Liguria Pepperoni.”
2. Defendant, Griffith Laboratories, Inc. (“Griffith Laboratories”) is a manufacturer of food seasonings and spice blends with its principal place of business in Alsip, Illinois.
3. As early as 1994, Griffith Laboratories commenced supplying custom seasoning blends for pepperoni and other dry sausage products provide by Humboldt Sausage, a subsidiary of Specialty Foods Group, which was a predecessor to Liguria Foods.
4. Liguria Foods and Griffith Laboratories did not enter into a written contract that governed their course of dealing.
5. Two synthetic antioxidants commonly used to delay oxidation in meat products include butylated hydroxyanisole (“BHA”) and butylated hydroxytoluen (“BHT”) to provide for a longer shelf life.
6. The United States Department of Agriculture (the “USDA”) regulates the allowable legal limits of BHA and BHT used in dry sausage, which are set forth in 9 CFR 318.7 (the “USDA Antioxidant Regulation”) and provides that the maximum allowable amount of BHA in dry sausage is 0.003%, or 30 parts per million, of the total weight of the batched product. The maximum allowable

amount of BHT in dry sausage is 0.003%, or 30 parts per million, of the total weight of the batched product.

7. BHA comprised 0.13950% of Griffith Laboratories' batch size for its formulation of Liguria's Optimized Pepperoni Seasoning.
8. BHT comprised 0.13950% of Griffith Laboratories' batch size for Liguria's Optimized Pepperoni Seasoning.
9. Griffith Laboratories sold Optimized Pepperoni Seasoning in bags weighing approximately 32.815 pounds. Griffith Laboratories required a minimum order of 300 bags of Optimized Pepperoni Seasoning.
10. Griffith Laboratories' typical batch of Optimized Pepperoni Seasoning was approximately 5,000 pounds or 150 bags.
11. In 2012, Griffith Laboratories also produced at least seven (7) different seasoning product formulations for other Liguria Foods' products, in addition to the Optimized Pepperoni Seasoning.
12. In early 2013, Liguria Foods experienced oxidation and discoloration of its Liguria Pepperoni product, which utilized Griffith Laboratories' Optimized Pepperoni Seasoning, and Liguria Foods received numerous customer complaints.
13. Specifically, on January 16, 2013, Jim Whitham, Liguria's Director of Quality Control emailed Kent Holt, a Griffith Account Director and the sales manager responsible for the Liguria account, with questions regarding the oxidation and discoloration issues.
14. Liguria claims that as a result of the oxidation and discoloration of the Liguria Pepperoni, it has incurred damages following the loss of three customers; the loss of volume from three customers; the issuance of credits for returned product from numerous customers; and the disposal of oxidized product.

**II. EXHIBIT LIST:** The parties' exhibit lists are attached to this Order.

**III. WITNESS LIST:** The parties intend to call the following witnesses at trial:

**A. Plaintiff's Witnesses:**

1. **Joe Henry:** Mr. Henry is Liguria Foods' Senior Vice President of Sales and Marketing. Mr. Henry is expected to testify regarding Liguria Foods' long-standing customer relationships since he joined Liguria Foods, and those customers who were lost in 2013 following the widespread oxidation of the Liguria regular pepperoni. Mr. Henry

is further expected to testify regarding his and Liguria Foods' efforts to secure new customers, both before and after the pepperoni oxidation issues which arose in 2013.

2. **Sonya Satern:** Ms. Satern is Liguria Foods' Controller. Ms. Satern is expected to testify regarding Liguria Foods' financial records. Ms. Satern is expected to testify regarding the financial data setting forth both credits and additional rebates given to Liguria Foods' customers, as a result of the oxidation of the Liguria regular pepperoni.

**(Griffith objects to any testimony by Ms. Satern as she was not disclosed by Liguria until after the close of fact discovery.) (Liguria Foods states in response to the objection of Griffith Laboratories that Ms. Satern was specifically identified and disclosed on July 15, 2016, in response to Griffith Laboratories' First Set of Interrogatories and Griffith Laboratories has never sought to depose Ms. Satern. Liguria Foods further states that both parties have responded to interrogatories after the closure of fact discovery. Liguria Foods has supplemented its production of documents to Griffith Laboratories on numerous occasions following the closure of fact discovery.)**

3. **Lance Chambers:** Mr. Chambers is Liguria Foods' former President and CEO. Mr. Chambers is expected to testify regarding his efforts to win back customers who were lost following the pepperoni oxidation issues in 2013, and all aspects of his role as President and CEO. Mr. Chambers is further expected to testify regarding Liguria Foods' sales data during the period he served as President and CEO. Mr. Chambers is expected to testify regarding the additional rebates given to Liguria Foods' customers who were impacted by the pepperoni oxidation, and Liguria Foods' attempts to win back the business of lost customers and secure new customers.
4. **James Bacus, Ph.D.** (to testify by videotaped deposition): Dr. Bacus is an Animal Science Professor with the University of Florida at Gainesville and is expected to testify consistent with his deposition. Dr. Bacus was a retained consultant to Griffith Laboratories in 2013. Dr. Bacus is expected to testify regarding his discussions with and recommendations to Griffith Laboratories concerning its production of pepperoni seasoning, particularly Griffith Laboratories' use of BHA and BHT. Dr. Bacus is expected to testify consistent with his deposition.

5. **Jim Whitham:** Mr. Whitham is Liguria Foods' former Quality Control Director. Mr. Whitham is expected to testify regarding Liguria Foods' quality control process, procedures, and policies. Mr. Whitham is expected to testify regarding Liguria Foods' investigation to determine the cause of the oxidation of its pepperoni in 2013, including his communications with numerous Griffith Laboratories personnel.
6. **Terry Mott:** Mr. Mott is a former Quality Control Manager with Liguria Foods' predecessor entities, Crest Pak, Humboldt Dry Sausage Co., and Specialty Foods Group. Mr. Mott is expected to testify regarding the shelf life studies he performed upon the Liguria regular pepperoni containing the seasoning produced by Griffith Laboratories, and the reason for Griffith Laboratories' input of BHA and BHT into the seasoning.
7. **Jehan Saulnier:** Mr. Saulnier is Liguria Foods' former President and CEO. Mr. Saulnier is expected to testify regarding Liguria Foods' investigation to determine the cause of the oxidation of its pepperoni in 2013, and his communications with numerous Griffith Laboratories personnel. Mr. Saulnier is further expected to testify regarding Liguria Foods' sales to various customers prior to 2013; Liguria Foods' receipt of complaints from those customers regarding the oxidation of pepperoni in 2013; and all aspects of his role as President and CEO of Liguria Foods.
8. **John Hawthorne** (to testify by videotaped deposition): Mr. Hawthorne is Sam's Club's former Café Buyer. Mr. Hawthorne is expected to testify regarding Liguria Foods' sale of its regular pepperoni to Sam's Club. Mr. Hawthorne is expected to testify consistent with all matters contained in his deposition.
9. **Don Connor:** Mr. Connor is Liguria Foods' former Purchasing Manager. Mr. Connor is expected to testify regarding Liguria Foods' purchase of numerous seasoning products from Griffith Laboratories, for use in a variety of Liguria Foods' products, including Optimized Pepperoni Seasoning in the Liguria regular pepperoni. Mr. Connor is expected to testify regarding his communications with various Griffith Laboratories personnel.
10. **Joe Christopherson:** Mr. Christopherson is Liguria Foods' Vice President of Operations. Mr. Christopherson is expected to testify regarding all aspects of Liguria Foods' operations.
11. **Andrew L. Milkowski, Ph.D.:** Dr. Milkowski is an expert witness disclosed by Liguria Foods pursuant to Rule 26(a)(2)(B). Dr. Milkowski earned his Ph.D. in Biochemistry

from the University of Wisconsin – Madison, serves as an Adjunct Professor of Meat Science at the University of Wisconsin – Madison, is a Principal of Milkowski Consulting, LLC, and worked in various capacities for the Oscar Mayer Division of Kraft Foods for approximately 30 years. Dr. Milkowski is expected to testify consistent with his expert reports.

12. **David S. Dickey, Ph.D.:** Dr. Dickey is an expert witness disclosed by Liguria Foods pursuant to Rule 26(a)(2)(B). Dr. Dickey earned his Ph.D. in Chemical Engineering from Purdue University, in West Lafayette, IN, and is a Principal of Mixtech, Inc. Dr. Dickey is expected to testify consistent with his expert reports.
13. **David J. Harkavy, CPA, CFF:** Mr. Harkavy is a Certified Public Accountant who earned his M.S. in Finance from the University of Wisconsin – Madison, and his B.S. in Accounting from Indiana University. Mr. Harkavy is a Director of the Claro Group and is expected to testify consistent with his expert reports.
14. **Kent Holt:** Mr. Holt is an employee of Griffith Laboratories who is expected to testify consistent with his deposition.
15. **George Neill:** Mr. Neill is an employee of Griffith Laboratories who is expected to testify consistent with his deposition.
16. **Sanny Shah:** Mr. Shah is an employee of Griffith Laboratories who is expected to testify consistent with his deposition.
17. **Kathy Adams:** Ms. Adams is an employee of Griffith Laboratories who is expected to testify consistent with her deposition.
18. **Darrell Portz:** Mr. Portz is an employee of Griffith Laboratories who is expected to testify consistent with his deposition.
19. **Louis Windecker:** Mr. Windecker is an employee of Griffith Laboratories who is expected to testify consistent with his deposition.
20. **Christopher Woods:** Mr. Woods is an employee of Griffith Laboratories who is expected to testify consistent with his deposition.
21. **Lynda Lathrop:** Ms. Lathrop is an employee of Griffith Laboratories who is expected to testify consistent with her deposition.
22. **David Kim:** Mr. Kim is an employee of Griffith Laboratories who is expected to testify consistent with his affidavit.



B. Defendant's Witnesses:

1. **Kathy Adams:** Ms. Adams is the Quality Systems Compliance Manager for Griffith. Ms. Adams is expected to testify concerning Griffith's program for responding to customer complaints, complying with customer audits, and Griffith's quality systems generally. Ms. Adams is also expected to testify concerning Griffith's communications with Liguria on prior customer complaints as well as Griffith's efforts to address Liguria's oxidation and rancidity issues in 2013.
2. **James Bacus, Ph.D.: (see above)** Dr. Bacus provided deposition testimony concerning his assistance to Griffith during Griffith's efforts to address Liguria's oxidation and rancidity issues in 2013. Dr. Bacus was also retained by Liguria to "reverse engineer" Griffith's spice blends. (Dr. Bacus will testify by deposition).
3. **Joe Christopherson: (see above)** Mr. Christopherson is expected to testify concerning his changes to Liguria's operations upon joining the Company in May 2013. Mr. Christopherson is also expected to testify concerning his investigation of the oxidation and rancidity issues in 2013.
4. **Don Connor: (see above)** Mr. Connor is expected to testify concerning the sales process between Liguria and Griffith.
5. **Kent Holt:** Mr. Holt is a Sales Manager for Griffith and was the salesperson responsible for Griffith's relationship with Liguria. Mr. Holt is expected to testify concerning the sales history with Liguria, Griffith's relationship with Liguria, and the efforts by Griffith to address Liguria's oxidation and rancidity issues in 2013.
6. **Lynda Lathrop:** Ms. Lathrop is a Senior Manager in Griffith's Analytical Chemistry Department. Ms. Lathrop is expected to testify concerning Griffith's testing programs and capabilities and the testing performed to investigate Liguria's oxidation and rancidity issues in 2013.
7. **George Neill:** Mr. Neill is the retired Vice President of Supply Chain for Griffith. From January 2010 to October 2014, Mr. Neill was the Plant Manager for Griffith's manufacturing facility in Alsip, Illinois. Mr. Neill is expected to testify about Griffith's manufacturing, mixing and packaging operations generally and about specific manufacturing matters related to Griffith's manufacture of the Liguria's pepperoni spice blend.

8. **Darrell Portz:** Mr. Portz is the Vice President for Food Safety and Quality Systems at Griffith. Mr. Portz is expected to testify concerning Griffith's quality control programs, testing procedures, and the efforts Griffith made to respond to Liguria's oxidation and rancidity issues in 2013.
9. **Jehan Saulnier: (see above)** Mr. Saulnier is also expected to testify concerning changes to Liguria's facilities and operations during his tenure as President and Chief Executive Officer. Mr. Saulnier is also expected to testify concerning Liguria's quality control programs, audits of its facilities, and its investigation of the oxidation and rancidity issues in 2013.
10. **Stan Seavey:** Mr. Seavey is a principal of Process Quality Consulting LLC. Mr. Seavey was retained by Liguria in 2012 to audit its manufacturing operations and to recommend improvements to Liguria's operations and control systems. Mr. Seavey prepared a report describing his observations and recommendations. Liguria contacted Mr. Seavey in February 2013 to solicit his opinions concerning possible causes of Liguria's oxidation and rancidity issues. (Mr. Seavey will testify by deposition)
11. **Prem Singh:** Mr. Singh is the President of Teinnovations, Inc.. Liguria retained Mr. Singh in 2012 to review its "Dry Room Operations." Mr. Singh also assisted Mr. Seavey during his review of Liguria's operations in 2012. Mr. Singh prepared reports describing his observations and recommendations from those plant visits. In February 2013, Liguria contacted Mr. Singh to solicit his opinions concerning the possible causes of Liguria's oxidation and rancidity issues. (Mr. Singh will testify by deposition.)
12. **Jim Whitham: (see above)** Mr. Whitham is also expected to testify concerning Liguria's quality control process as well as Liguria's investigation of its oxidation and rancidity issues in 2013. in 2013.
13. **Louis Windecker:** Mr. Windecker is a Senior Principal Scientist in the Product Development Department at Griffith. Mr. Windecker is expected to testify concerning the Liguria pepperoni formula and mixing instructions, changes to that formula, the development of additional spice blends for Liguria, and efforts made by Griffith to address Liguria's oxidation and rancidity issues in 2013



14. **Francis X. Burns:** Mr. Burns is a Principal at Global Economics Group, LLC. Mr. Burns will testify concerning Liguria's alleged damages. Mr. Burns will also respond specifically to the testimony of David Harkavy.
15. **John W. Carson, Ph.D.:** Dr. Carson is the President of Jenike & Johanson. Dr. Carson will testify concerning mixing and blending issues and will respond specifically to the testimony of Dr. David Dickey.
16. **Kevin M. Keener, Ph.D.:** Dr. Keener is a professor in the Department of Food Science and Human Nutrition at Iowa State University. He is also the Director of both the Center for Crops Utilization Research and the BioCentury Research Farm at Iowa State. Dr. Keener will testify concerning his review of Liguria's internal control programs and the significance of the Seavey and Singh reports from 2012.
17. **Joseph G. Sebranek, Ph.D.:** Dr. Sebranek is the Charles F. Curtiss Distinguished Professor of Agriculture and Life Sciences and the Morrison Endowed Chair in Meat Science at Iowa State University. Dr. Sebranek will testify concerning Liguria's investigation of its oxidation and rancidity issues and the possible causes of these issues. Dr. Sebranek will also respond specifically to the testimony of Dr. Andrew Milkowski.

All parties are free to call any witness listed by an opposing party. A party listing a witness guarantees his or her presence at trial unless it is indicated otherwise on the witness list. ***Any objection to the offer of testimony from a witness on the witness list is waived if it is not stated on this list.***

**V<sup>1</sup>. EVIDENTIARY AND OTHER LEGAL ISSUES:**

**A. Plaintiff's Issues:**

1. Whether Griffith Laboratories is liable for breach of the implied warranty of fitness for a particular purpose in its production of Optimized Pepperoni Seasoning for Liguria Foods and, if so, what are Liguria Foods' damages?
2. Whether Griffith Laboratories is liable for breach of the implied warranty of merchantability in its production of Optimized Pepperoni Seasoning for Liguria Foods and, if so, what are Liguria Foods' damages?
3. Whether Griffith Laboratories may assert an affirmative defense of "failure to mitigate damages" where its damages expert, Francis X. Burns, has opined that Liguria Foods

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<sup>1</sup> Section IV is not listed in Appendix B of the Court's Trial Management Order for Civil Jury Trial, dated January 27, 2017.

mitigated its damages in the two-year period following the oxidation of the pepperoni containing Griffith Laboratories' Optimized Pepperoni Seasoning?

4. Whether Griffith Laboratories may assert an affirmative defense of "failure to observe reasonable care," where it failed to plead in its Amended Answer and Affirmative Defense (filed on December 10, 2014) an affirmative defense of "failure to reasonable care" (Defendant's Issue No. 3 below)?
5. Whether Griffith Laboratories may assert an affirmative defense of "comparative fault" where it failed to plead in its Amended Answer and Affirmative Defense (filed on December 10, 2014) an affirmative defense of "comparative fault" (Defendant's Issue No. 4 below)?

B. Defendant's Issues:

1. Liguria contends that its "particular purpose" for the Optimized Pepperoni Seasoning was to ensure a 270-day shelf life for its products. Griffith contends that it did not know that Liguria was relying on Griffith for this purpose and that to do so would not be reasonable under the circumstances.
2. Concerning Liguria's allegation of breach of the implied warranty of merchantability, Griffith contends that the Optimized Spice Blend:
  - a. was manufactured according to its instructions and Liguria has not and cannot identify any manufacturing defect necessary to establish such a claim;
  - b. did not contain a design defect in that the product met all of the requirements established by Liguria and Liguria has not identified a reasonable alternative design which would have eliminated the problems which Liguria experienced.
3. To the extent that Liguria suffered damages, the damages were the result of Liguria's failure to observe a reasonable standard of care.
4. To the extent Liguria is awarded any damages in this case, those damages must be reduced by the amount Liguria contributed to any such problems as a result of its own fault.
5. Liguria failed to mitigate its damages as a result of its misleading and dishonest statements to its own customers.

LIGURIA FOODS, INC.

By:   
One of its Attorneys

GRIFFITH LABORATORIES, INC.

By:   
One of its Attorneys

IT IS SO ORDERED.

DATED this 28<sup>TH</sup> day of April, 2017.

  
MARK W. BENNETT  
U.S. DISTRICT COURT JUDGE  
NORTHERN DISTRICT OF IOWA

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF IOWA  
CENTRAL DIVISION**

LIGURIA FOODS, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 3:14-CV-3041-MWB
	)	
GRIFFITH LABORATORIES, INC.,	)	
	)	
Defendant.	)	

**JOINT TRIAL EXHIBIT LIST**  
**AS OF APRIL 28, 2017**

Plaintiff, Liguria Foods, Inc. (“Liguria”), and Defendant, Griffith Laboratories, Inc. (“Griffith”) by their undersigned counsel, as their list of proposed joint trial exhibits as of April 28, 2017, in accordance with the Court’s Order of January 27, 2017, state as follows:

Joint Exhibit #	Joint Exhibits	Categ. A, B, C	Obj.	Offered	A/NA
1	Liguria Shelf Life Study using Griffith Pepperoni Seasoning (LIGURIA_GRIFF 025026-25028) (Carson Dep. Ex. 10; Sebranek Dep. Ex. 3; Milkowski Dep. Ex. 5)	A			
2	Griffith Pepperoni Seasoning History of Formulations (GLAB000476; Dickey Dep. Ex. 5)	A			
3	7/1/09 – 7/20/09 Griffith internal emails; K. Adams re: shelf-life of Liguria pepperoni (GLAB000884-88; Adams Dep. Ex. 6)	A			
4	7/1/09 – 7/22/09 Griffith internal emails (GLAB000876-81; Adams Dep. Ex. 7)	A			
5	7/27/09 – Griffith– Liguria emails: J. Whitham to K. Holt – pepperoni seasoning with Higher Density Capsicum – causes pepperoni to be uniformly darker/redder, too red (GLAB 000874-75; Adams Dep. Ex. 8)	A			
6	7/27/09 Griffith-Liguria emails, D. Connor – K. Holt, J. Whitham, G. Pearson re: too red of product made w/spice block w/higher capsicum (GLAB002929)	A			
7	6/24/10 Griffith email; G. Neill to K. Holt re: return from Liguria due to off color of seasoning;	A			

Joint Exhibit #	Joint Exhibits	Categ. A, B, C	Obj.	Offered	A/NA
	(GLAB002663-64; Holt Dep, Ex. 23)				
8	4/28/11 Griffith email: K. Holt to Griffith team, informing Liguria approval of transition to Optimized Pepperoni Seasoning 017-2112-00 from prior formula 017-0975-02 (GLAB002961-63; Adams Dep. Ex. 13; Dickey Dep. Ex. 4)	A			
9	7/18/12 Griffith "Formula Version Printout" for Optimized Pepperoni Seasoning, Local No. 017-2112 (GLAB000021-22; Adams Dep. Ex. 14; Bacus Dep. Ex. 4; Carson Dep. Ex. 7)	A			
10	1/22/13, 1/18/13, 1/16/13: Griffith-Liguria emails, K. Holt & J. Whitham re: product color loss (GLAB001483-86; Adams Dep. Ex. 16)	A			
11	1/16/13: Griffith-Liguria emails, E. Werth, K. Holt, M. Warren, L. Windecker, S. Shah; answers to questions re: product color loss (GLAB001494-1496; Sebranek Dep. Ex. 9)	A			
12	1/22/13, 1/28/13 Griffith Customer Complaint Database, re: Optimized Pepperoni Seasoning 017-2112-00 (GLAB001474-75; Shah Dep. Ex. 22)	A			
13	1/25/13 D. Connor to K. Holt email re: product color loss (LIGURIA/GRIFF 006802; Connor Dep. Ex. 4)	A			
14	1/25/13 Griffith-Liguria emails: D. Connor to K. Holt; D. Connor re: product color loss (LIGURIA/GRIFF 006803-04, Connor Dep. Ex. 5)	A			
15	1/24/13 – 1/25/13 Griffith-Liguria emails; J. Whitham to K. Adams, inquiring re: BHA and BHT results (GLAB001481-82; Adams Dep. Ex. 17)	A			
16	2/8/13 – 2/14/13 Griffith-Liguria emails: K. Adams & J. Whitham re: BHA/BHT levels (GLAB001417-22; Adams Dep. Ex. 24; Shah Dep. Ex. 27)	A			
17	2/8/13 – 2/13/13 Griffith-Liguria emails: K. Adams to J. Whitham, describes differences between 0170975 and 0172112 (GLAB001423-27; Adams Dep. Ex. 24)	A			
18	2/20/13 Griffith-Liguria email, K. Adams to J. Whitham (LIGURIA/GRIFF 002032-2033)	A			
19	2/22/13 Liguria email, J. Whitham, re: addition of rosemary (LIGURIA/GRIFF 017152)	A			
20	3/11/13 Griffith-Liguria Email from K. Adams re: Fatty Acid Profile results (GLAB 001366 – GLAB 001379)	A			
21	3/4/13 Griffith email, L. Windecker – K. Holt re: Sample Request Form for Liguria's Opt Pepp Seas-35, Opt Pepp Seas-38, Opt Pepp Seas-40, Opt Pepp Seas-45	A			

Joint Exhibit #	Joint Exhibits	Categ. A, B, C	Obj.	Offered	A/NA
	(GLAB001965-1968; Windecker Dep. Ex 23)				
22	3/5/13 Griffith-Liguria email, L. Windecker to J. Whitham (GLAB001399-1403; Adams Dep., Ex. 25)	A			
23	3/7/13 – 3/8/13 Liguria email, J. Whitham to Prof. Jim Dickson, and cc: Prof. Sebranek re: anti-caking (LIGURIA/GRIFF 014821)	A			
24	3/8/13 Griffith internal email, L. Windecker to Griffith team re: DDGS and Silliker data (GLAB001391-93; Adams Dep. Ex. 26)	A			
25	3/11/13 Griffith memo; summary by K. Adams re: Griffith Pepperoni Seasoning 017-2112-00; 1/16/13 to 3/11/13 (GLAB001380-90; Adams Dep. Ex. 27; G. Neill Dep. Ex. 16; Shah Dep. Ex. 28)	A			
26	3/14/13 Griffith's "Liguria Trip Report – 3/14/13" (by K. Adams) (GLAB000478-481; Adams Dep. Ex. 34A; Bacus Dep. Ex. 8; Carson Dep. Ex. 14; Hawthorne Dep. Ex. 16)	A			
27	3/15/13, 3/13/13 Griffith-Liguria emails, G. Neill and Griffith personnel re: salt and rosemary booster bag and Griffith's payment of booster bags (GLAB001331-1332; Neill Dep. Ex. 21)	A			
28	3/18/13 Griffith "Sales Call Report" by Kent Holt (re: 3/14/13 meeting) (GLAB002346-47; Adams Dep. Ex. 35; Bacus Dep. Ex. 9)	A			
29	3/18/13 Griffith internal email re: Liguria Trip Report to Griffith (GLAB001325-1329; Sebranek Dep. Ex. 20; Adams Dep. Ex. 34B)	A			
30	3/21/13 Griffith internal email, Amy Jones, VP Prod. Dvlpt., to team, lists 13 next steps to team re: BHA/BHT (GLAB000459; Adams Dep. Ex. 39)	A			
31	3/21/13 Griffith email, L. Lanthrop – Griffith personnel re: analysis of samples (GLAB000465; Lathrop Dep. Ex. 23)	A			
32	3/21/13 Griffith email/memo, K. Adams email and memo to J. Whitham (GLAB001317-1322; Adams Dep. Ex. 38)	A			
33	3/27/13 Griffith internal email, K. Adams to Griffith team, re: "Liguria Root Cause Analysis" (GLAB001299-1304; Adams Dep. Ex. 44; Sebranek Ex. 15; Adams Dep. Ex. 44)	A			
34	4/1/13 Griffith-Liguria email, K. Holt – C. Woods, D. Connor – K. Holt re: if Liguria returning to original formulation	A			



Joint Exhibit #	Joint Exhibits	Categ. A, B, C	Obj.	Offered	A/NA
	(GLAB000978-979; Holt Dep. Ex. 66)				
35	4/5/13, Griffith internal email, K. Holt to C. Woods, C. Carr re: summary of conference call w/Liguria (GLAB001277-1278; Saulnier Dep. Ex. 18)	A			
36	4/8/13, Griffith-Liguria email; K. Holt to J. Saulnier, C. Woods re: Liguria formulation history for pepperoni seasonings & attachment (GLAB001528-1529; Saulnier Dep. Ex. 19; Woods Dep. Ex. 25)	A			
37	4/16/13 Griffith Memorandum, D. Portz to J. Saulnier (LIGURIA/GRIFF 005640-44; Saulnier Dep. Ex. 22; Carson Dep. Ex. 18)	A			
38	4/26/13 Griffith Memorandum, D. Portz to J. Saulnier (GLAB000237-242; Saulnier Dep. Ex. 26; Carson Dep. Ex. 20)	A			
39	5/7/13 Griffith email, K. Holt to C. Woods re: conversations w/Liguria and J. Saulnier (GLAB001208-1209; Woods Dep. Ex. 35; Holt Dep. Ex. 74)	A			
40	5/12/13 Liguria email, J. Saulnier to personnel, re: rough time line of events (LIGURIA/GRIFF014980-14982; Saulnier Dep. Ex. 28)	A			
41	6/21/13 Griffith-Liguria email, C. Yuknis to J. Saulnier & J. Whitham re: labeling of restricted ingredients (GLAB 001121-22)	A			
42	10/10/13 Griffith email re: Liguria's moving of business to another supplier (GLAB001034; Holt Dep. Ex. 91)	A			
43	10/30/13 Griffith-Liguria emails, J. Saulnier – C. Woods and Griffith personnel re: meeting in Chicago on 11/20/13 (GLAB001024-1027)	A			
44	11/27/13 Liguria email, J. Saulnier to L. Chambers & Liguria team (various charts/data) (LIGURIA/GRIFF 006014 – 006029; Saulnier Dep. Ex. 40)	A			
45	3/20/13 Email from J. Bacus to J. Whitham (LIGURIA/GRIFF015060; Bacus Dep. Ex. 12)	A			
46	4/23/13 Griffith Memorandum, D. Portz to J. Saulnier (JBACUS000010-16; Bacus Dep. Ex. 16)	A			
47	2/11/13 Liguria email from J. Saulnier re: testing XF beefs for rancidity (LIGURIA/GRIFF 018843- 018853)	A			
48	Griffith Labs/Kathy Adams Traceability Table (GLAB001271-1276)	A			

Joint Exhibit #	Joint Exhibits	Categ. A, B, C	Obj.	Offered	A/NA
49	10/10/13 Griffith-Liguria email D. Connor –K. Holt re: last purchase order w/Griffith, going w/another supplier (GLAB001039-1040; Holt Dep. Ex. 89)	A			
50	6/3/13 Liguria email, J. Saulnier to J. Peter Clark (LIGURIA/GRIFF 014331-014337)	A			
51	5/17/13 Liguria memo, J. Whitham to J. Saulnier, re: Sam's Club (LIGURIA/GRIFF 002411-2417)	A			
52	4/9/13 Liguria emails, D. Connor to J. Saulnier, re: Rosemary Booster Bags (LIGURIA/GRIFF 015816-15818)	A			
53	4/9/13 Griffith-Liguria email, K. Adams – J. Whitham , D. Portz re: Liguria Traceability Charting & Attachments (LIGURIA/GRIFF 006935-6953)	A			
54	3/28/13 Liguria internal email re: Newlyweds Foods using liquid versions of BHT/BHA (LIGURIA/GRIFF 002215-2218)	A			
55	2012 Liguria Raw Material Data Listing (LIGURIA/GRIFF 001644-1675)	A			
56	12/1/11 Liguria email, J. Saulnier – P. Simkus re: Brand Tiers & attached product tiers (LIGURIA/GRIFF 017132-17133)	A			
57	Confidential Comparative Customer Complaint Summary Report for Production Periods 2012 to 2013 (LIGURIA/GRIFF 0017112-17115)	A			
58	Liguria Internal Control Procedures (LIGURIA/GRIFF004024-004025)	A			
59	4/4/13 Griffith internal email re: BHA BHT testing (GLAB001280-1282; Carson Dep. Ex. 9; Sebranek Dep. Ex. 17; Portz Dep. Ex. 7; Shah Dep. Ex. 37)	A			
60	3/13/13 Griffith internal email, from C. Carr to Griffith personnel re: Powerpoint for meeting at Liguria on 3/14/13 (GLAB001342-1359)	A			
61	Liguria Business Review Presentation to Sam's Club. April 26, 2010 (LIGURIA/GRIFF015344 – 015353)	A			
62	Executed Affidavit of John R. Hawthorne (LIGURIA/GRIFF026089 – 026091; Hawthorne Dep. Ex. 1)	A			
63	3/6/13 Griffith-Liguria email, J. Whitham to L. Windecker re: update on Liguria pepperoni (GLAB001394-1408; Adams Dep. Ex. 25; Milkowski Dep. Ex. 6)	A			

Joint Exhibit #	Joint Exhibits	Categ. A, B, C	Obj.	Offered	A/NA
64	Liguria Operational Excellence 2012 DRAFT Output, July 10-12, 2012 (LIGURIA/GRIFF 026723 – 026785)	A			
65	J. Bacus Curriculum Vitae (pp. 490-491, Liguria MSJ Response; Plaintiff's Bacus Dep. Ex. 1)	A			
66	7/15/13 Email from J. Bacus to Liguria (LIGURIA/GRIFF004415-4421; Defendant's Bacus Dep. Ex. 1)	A			
67	J. Bacus Article: Antioxidants: Practical Technologies to Improve Food Safety; Meat Industry Research Conference, Oct. 1991 (LIGURIA/GRIFF 015390-97; Bacus Dep. Ex. 2)	A			
68	3/11/13 Griffith – Dr. Jim Bacus emails; L. Windecker email to Dr. Bacus (JBACUS000005-000006; Bacus Dep. Ex. 5)	A			
69	Undated Griffith email, L. Windecker to Dr. Jim Bacus, initially informing him re: pepperoni issue (JBACUS000007-000009; Bacus Dep. Ex. 6)	A			
70	3/11/13 Griffith memo; summary by K. Adams re: Griffith Pepperoni Seasoning 017-2112-00; 1/16/13 to 3/11/13 (JBACUS000032-000040; Bacus Dep. Ex. 7)	A			
71	3/14/13 Griffith PPT presentation: Liguria Pepperoni Situation Working Session (JBACUS000017-000031; Bacus Dep. Ex. 10)	A			
72	4/26/13 Griffith Memorandum, D. Portz to J. Saulnier (LIGURIA/GRIFF001472-1477; Bacus Dep. Ex. 17)	A			
73	Griffith Presentation re: Rancimat Technology (JBACUS000045-000050; Bacus Dep. Ex. 31)	A			
74	Griffith Presentation re: Rancimat Technology (JBACUS000051-000059; Bacus Dep. Ex. 32)	A			
75	Liguria Raw Materials Specification (LIGURIA/GRIFF018811-18826; Hawthorne Dep. Ex. 13)	A			
76	Liguria Foods, Inc. – Internal Control Procedures – Rework Control (2/1/2013) (LIGURIA/GRIFF004051-4052)	A			
77	3/5/13 – 3/6/13 Griffith-Liguria emails, K. Adams and J. Whitham, re: Griffith and ABC Labs testing results re: BHA/BHT (LIGURIA/GRIFF 002037 – 2039)	A			
78	2/4/13 - 2/8/13 Griffith-Liguria emails: J. Whitham to K. Adams re: levels of antioxidants; K. Adams to J. Whitham: identifying 7 types of seasoning to include BHA/BHT testing	A			

Joint Exhibit #	Joint Exhibits	Categ. A, B, C	Obj.	Offered	A/NA
	(GLAB01444-1452; Adams Dep. Ex. 21)				
79	1/30/13 Griffith internal email: K. Adams to Griffith Team, and 1/29/13 test results on complaint vs. target pepperoni (GLAB01459-1473; Adams Dep. Ex. 19)	A			
80	5/12/13 Griffith, Liguria email, D. Portz – J. Saulnier, J. Bacus, K. Holt re: Rancimat Testing Summary produced by Griffith (GLAB01197-1206; Lathrop Dep. Ex. 30; Portz Dep. Ex. 20)	A			
81	Affidavit of Terry W. Mott (Carson Dep. Ex. 10; Sebranek Dep. Ex. 3; Milkowski Dep. Ex. 5)	A			
82	Confidential Information Presentation (“the BlackArch Presentation”) for the potential sale of Liguria (LIGURIA/GRIFF025563 – 025635)	A			
83	Liguria Foods, Inc. – Internal Control Procedures – Rework Control (2/28/2011) (LIGURIA/GRIFF 026839)	A			
84	Liguria Foods, Inc. – Internal Control Procedures – Rework Control (11/19/2012) (LIGURIA/GRIFF 026838)	A			
85	3/21/13 Griffith Memorandum, K. Adams memo to J. Whitham (LIGURIA/GRIFF006913-6916; Bacus Dep. Ex. 11)	A			
86	7/16/13, 7/12/13 Liguria email, J. Bacus – J. Christopherson re: testing of conversion of dry spices to liquids (LIGURIA/GRIFF 004448-4450)	A			
87	7/7/09 – 7/9/09 Griffith-Liguria emails: K. Adams - J. Whitham re: shelf-life of Liguria pepperoni (GLAB002932-2934; Adams Dep. Ex. 5)	A			

Date: April 28, 2017

Respectfully Submitted,

**LIGURIA FOODS, INC.**

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**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF IOWA  
CENTRAL DIVISION**

LIGURIA FOODS, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 3:14-CV-3041-MWB
	)	
GRIFFITH LABORATORIES, INC.,	)	
	)	
Defendant.	)	

**LIGURIA FOODS, INC.'S TRIAL EXHIBIT LIST**  
**AS OF APRIL 28, 2017<sup>2</sup>**

Plaintiff, Liguria Foods, Inc. ("Liguria"), by its undersigned counsel, as its list of proposed trial exhibits as of April 28, 2017, in accordance with the Court's Order of January 27, 2017, states as follows:

Ex.#	Plaintiff's Exhibits	Category A, B, C	Obj.	Offered	A/ NA
1	2/11/13 Liguria Product & Customer Complaint Form and Photographs from Customer: Roma Denver; Lot #192866; Exp. Date: 5/17/13 (LIGURIA/GRIFF 000581-585)	A			
2	2/26/13 Liguria Product & Customer Complaint Form and Photographs from Customer: Roma Philadelphia; Lot #192926; Exp. Date. 7/19/13; 3/11/13 Liguria email, J. Whitham – L. Chapin re: Roma Philadelphia complaint (LIGURIA/GRIFF 000586-597)	A			
3	2/8/13 Liguria Product & Customer Complaint Form and Photographs from Customer: Cass Imports; Lot #192884; Exp. Date. 6/7/13 (LIGURIA/GRIFF 000598-602)	A			

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<sup>2</sup> A Joint Exhibit List has been submitted separately by the parties. All Joint Exhibits have been removed from Plaintiff's Exhibit List and are denoted with an asterisk (\*).



4	2/8/13 Liguria Product & Customer Complaint Form and Photographs from Customer: Roma Philadelphia; Lot #192926; Exp. Date 7/19/13 (LIGURIA/GRIFF 000606-618)	A			
5	2/4/13 Liguria Product & Customer Complaint Form and Photographs from Customer: PFG Dallas; Lot #192866; Exp. Date 5/24/13; 2/4/13 Liguria email, J. Meuschke – B. Hoskins, Liguria personnel re: PFG complaint (LIGURIA/GRIFF 000622-636)	A			
6	1/28/13 Liguria Product & Customer Complaint Form and Photographs from Customer: Pepes Wholesale; Lot #192863, Exp. Date 5/17/13 (LIGURIA/GRIFF 000645-649)	A			
7	1/25/13 Liguria email and Photographs, J. Henry – Liguria personnel re: Roma Henderson complaint (LIGURIA/GRIFF000650-654)	A			
8	1/23/13 Liguria Product & Customer Complaint Form and Photographs from Customer: Roma Portland; Lot #192897; Exp. Date: 6/21/13 (LIGURIA/GRIFF 000655-661)	A			
9	2/11/13 Liguria Product & Customer Complaint Form and Photographs from Customer: Roma Denver; Lot #192926; Exp. Date: 7/19/13 (LIGURIA/GRIFF 000677-681)	A			
10	1/5/13 Liguria Product & Customer Complaint Form and Photographs from Customer: Joseph Martin; Lot #192843; Exp. Date: 4/26/13 (LIGURIA/GRIFF 000687-689)	A			
11	1/15/13 Liguria Product & Customer Complaint Form and Photographs from Customer: Sysco Central Texas; Lot #192862; Exp. Date: 5/17/13 (LIGURIA/GRIFF 000690-698)	A			
12	3/21/13 Liguria Product & Customer Complaint Form and Photographs from Customer: Mineo Wholesale; Lot #192948; Exp. Date: 8/9/13; 3/28/13 Liguria email, J. Todaro – Liguria personnel re: Mineo Wholesale complaint (LIGURIA/GRIFF 000705-711)	A			
13	3/15/13 Liguria Product & Customer Complaint Form and Photographs from Customer: Roma Indy; Lot #192910; Exp. Date: 7/5/13; 3/15/13 Liguria emails, L. Oshiro – Liguria personnel, J. Henry – Liguria personnel re: Roma Indy complaint (LIGURIA/GRIFF 000730-740)	A			

14	3/8/13 Liguria Product & Customer Complaint Form and Photographs from Customer: Nappies; Lot #193649 (193650-Photos); Exp. Date: 6/28/13 (LIGURIA/GRIFF 000741-749)	A			
15	3/11/13 Liguria Product & Customer Complaint Form and Photographs from Customer: Roma; Lot #192911; Exp. Date: 7/5/13 (LIGURIA/GRIFF 000750-752)	A			
16	3/7/13 Liguria Product & Customer Complaint Form and Photographs from Customer: Roma Springfield; Lot #192932; Exp. Date: 7/26/13 (LIGURIA/GRIFF 000772-776)	A			
17	2/20/13 Liguria Product & Customer Complaint Form and Photographs from Customer: PFG Miltons; Lot #192932; Exp. Date: 7/26/13; 3/1/13, 2/26/13 Liguria email, D. Dodge – Liguria personnel re: PFG Miltons complaint (LIGURIA/GRIFF 000789-792)	A			
18	2/26/13 Liguria Product & Customer Complaint Form and Photographs from Customer: Roma Philadelphia; Lot #192926; Exp. Date: 7/19/13 (LIGURIA/GRIFF 000804-811)	A			
19	2/22/13 Liguria Product & Customer Complaint Form and Photographs from Customer: Casa Imports; Lot #192869; Exp. Date: 5/24/13 (LIGURIA/GRIFF00819-823)	A			
20	2/22/13 Liguria Product & Customer Complaint Form and Photographs from Customer: Casa Imports; Lot #192871; Exp. Date: 5/24/13 (LIGURIA/GRIFF 000819-826)	A			
21	2/19/13 Liguria Product & Customer Complaint Form and Photographs from Customer: Roma Philadelphia; Lot #192926; Exp. Date: 7/19/13 (LIGURIA/GRIFF 000841-843)	A			
22	4/15/13 Liguria Product & Customer Complaint Form and Photographs from Customer: Canal Fulton Provision; Lot #192959; Exp. Date: 8/23/13 (LIGURIA/GRIFF 000868-872)	A			
23	4/29/13 Liguria Product & Customer Complaint Form from Customer: Gulinellos; Lot #192971; Exp. Date: 9/6/13; 4/29/13 Liguria email, J. Todaro – Liguria personnel re: Gulinellos complaint (LIGURIA/GRIFF 000925-926)	A			

24	5/5/13 Liguria Product & Customer Complaint Form and Photographs from Customer: Lisanti Foods; Lot #192985; Exp. Date: 9/20/13 (LIGURIA/GRIFF000927-931)	A			
25	4/5/13 Liguria Product & Customer Complaint Form and Photographs from Customer: Reinhart Boston; Lot #192975; Exp. Date: 9/6/13; 4/8/13, 4/6/13, 4/5/13 Liguria emails, J. Todaro – Liguria personnel re: Reinhart Boston complaint (LIGURIA/GRIFF 000947-958)	A			
26	3/29/13 Liguria Product & Customer Complaint Form and Photographs from Customer: Roma Orlando; Lot #192938; Exp. Date: 8/2/13 (LIGURIA/GRIFF 000959-964)	A			
27	3/26/13 Liguria Product & Customer Complaint Form and Photographs from Customer: PFG Florida; Lot #192933; Exp. Date: 7/26/13; 3/27/13 Liguria emails, D. Dodge – Liguria personnel re: PFG Florida complaint (LIGURIA/GRIFF 000973-982)	A			
28	3/21/13 Liguria Product & Customer Complaint Form and Photographs from Customer: Roma Springfield; Lot #192939; Exp. Date: 8/2/13 (LIGURIA/GRIFF 000983-987)	A			
29	11/6/12 Liguria Product & Customer Complaint Form and Photographs from Customer: Roma Arizona; Lot #192775; Exp. Date: 2/22/13 (LIGURIA/GRIFF001016)	A			
30	11/6/12 Liguria emails, L. Oshiro – Liguria personnel re: Roma Arizona complaint (LIGURIA/GRIFF 001017-1026)	A			
31	10/22/12 Liguria Product & Customer Complaint Form and Photographs from Customer: Roma North Carolina; Lot #192818; Exp. Date: 4/5/13 (LIGURIA/GRIFF 001032-1038)	A			
32	6/5/13 Liguria Product & Customer Complaint Form and Photographs from Customer: Big Apple/Casa Imports; Lot #193717; Exp. Date: 12/28/13; 6/5/13 Liguria emails, J. Todaro – Liguria personnel re: Big Apple/Casa Imports (Trotto's Pizza) complaint (LIGURIA/GRIFF 001110-1119)	A			
33	2/5/13 Liguria Product & Customer Complaint Form and Photographs from Customer: Roma NC; Lot #192926; Exp. Date: 7/19/13; 2/15/13 Liguria	A			

	emails, J. Meuschke – Liguria personnel re: Roma NC complaint (LIGURIA/GRIFF 001207-1217)				
34	Liguria Complaint Log 2013 (LIGURIA/GRIFF 001156-1158)	A			
35	7/1/13 Liguria MFG Product Complaint Detail – By Customer (LIGURIA/GRIFF 001159-1160)	A			
36	Liguria Complaint Log 2013 (LIGURIA/GRIFF 001161-1163)	A			
37	Liguria Complaint Log 2012 (LIGURIA/GRIFF 001164-1168)	A			
38	1/6/14 Liguria email J. Whitham –Liguria personnel re: Updated Customer Complaint Log & Liguria’s Updated Complaint Log (LIGURIA/GRIFF 024338-024492)	A			
39	Liguria Product Listing Details (Meat/Spice Blocks) (LIGURIA/GRIFF025965)	B	FRCP 26(e)(1)(A)		
40	Sam’s Club & Liguria Foods Business Review (Sept. 1, 2011) (LIGURIA/GRIFF 026080-026087)	A			
41	Sam’s Club & Liguria Foods Business Review (Feb. 2, 2012) (LIGURIA/GRIFF 026054-026064)	A			
42	Sam’s Club & Liguria Foods Business Review (March 14, 2013) (LIGURIA/GRIFF 026066-026078)	A			
43	Liguria Presentation to Houlihan & Lokey Consumer & Food Conference (Feb. 2013) (LIGURIA/GRIFF 025798-025814)	B	FRCP 26(e)(1)(A)		
44	Griffith Pepperoni Seasoning Sales to Liguria – 2009 to 2014 (GLAB003125-3128; Holt Dep. Ex. 59)	A			
45	[OMITTED]				
46	[OMITTED]				
47*	<b>JOINT EXHIBIT NO. 75</b> (Liguria Raw Materials Specification (LIGURIA/GRIFF018811-18826))				
48	7/15/13 Complaint Analysis (LIGURIA/GRIFF015425-15429; Saulnier Dep. Ex. 33)	A			
49	Liguria Product Specification for Liguria Sliced Pepperoni (LIGURIA/GRIFF 002172-2173)	A			
50	Liguria Product Specification for Grattifica Sliced Pepperoni	A			

	(LIGURIA/GRIFF 002174-2175)				
51	Liguria Product Summary (LIGURIA/GRIFF 002181)	A			
52	Liguria Product Details (Meat/Spice Blocks) (LIGURIA/GRIFF 025065)	A			
53	Griffith Web Pages (LIGURIA/GRIFF026641- 26672)	A			
54	Sam's Club Refunds/Credits (LIGURIA/GRIFF 026598 – 026607)	A			
55	Liguria Rolling P&L (through 11/2016) (LIGURIA/GRIFF 026608)	A			
56	Liguria General Ledger Account (through 11/2016) (LIGURIA/GRIFF 026609 – 026611)	A			
57	Liguria Pounds/Sales/Contribution Margin (through 11/2016) (LIGURIA/GRIFF 026612 – 026614)	A			
58	Liguria Customer Rebate Information (LIGURIA/GRIFF 026615)	A			
59	Liguria FYTD October Sales (through 11/2016) (LIGURIA/GRIFF 026616)	A			
60*	<b>JOINT EXHIBIT NO. 81</b> Affidavit of Terry W. Mott (Carson Dep. Ex. 10; Sebranek Dep. Ex. 3; Milkowski Dep. Ex. 5)				
61*	<b>JOINT EXHIBIT NO. 1</b> (Liguria Shelf Life Study using Griffith Pepperoni Seasoning (LIGURIA_GRIFF025026-25028) (Carson Dep. Ex. 10; Sebranek Dep. Ex. 3; Milkowski Dep. Ex. 5))				
62	Liguria's 2013 Annual Report (LIGURIA/GRIFF025162-025178)	A			
63	Liguria Customer Rebate Data (LIGURIA/GRIFF 026230 – 026243)	A			
64	Liguria Customer Rebate Data (LIGURIA/GRIFF 026617 – 026619)	A			
65	Liguria Product Disposal Data (LIGURIA/GRIFF 026244 – 026333)	A			
66	Liguria Product Disposal Data (LIGURIA/GRIFF 026620 – 026640)	A			
67	Liguria Customer Credit Memo Data (LIGURIA/GRIFF 026491 – 026561)	A			
68	Griffith Mixing Operator Job Posting (Shah Dep. Ex. 7)	A			
69	Griffith Mixing Operator Job Posting (Shah Dep. Ex. 8)	A			

70	1/29/13 Griffith Letter to J. Whitham – K. Adams -- K. Holt, T. Kane, G. Neill, S. Shah, D. Portz re: Liguria customer complaint concerning pepperoni color not holding shelf life and investigation (GLAB001468-1469; Shah Dep. Ex. 23)	A			
71	3/11/13 Griffith Letter to Liguria from K. Adams re: findings about pepperoni not holding shelf life (GLAB000542-547; Shah Dep. Ex. 30)	A			
72	6/21/13 Griffith R&D Formula Explosion (GLAB000034-35; Shah Dep. Ex. 10)	A			
73	6/25/13 Griffith Formula Change request for Liguria 017-2368 (GLAB0000028; Shah Dep. Ex. 16)	A			
74	4/01/14 Griffith “OP 42-01 Control of Documents and Records” (Griffith Document Retention Policy) (GLAB003086-89; Shah Dep. Ex. 3; Adams Dep. Ex. 50)	A			
75	[OMITTED]				
75A	Liguria’s Purchase Order for Optimized Pepperoni Seasoning, Purchase Order #PO113974, Sales Order #1000516776, Invoice #649303, Purchase Order Date: 2/02/12, Invoice Date: 2/27/12, Ship Date: 2/27/12 (LIGURIA/GRIFF000367-372; Holt Dep. Ex. 60)	A			
75B	Liguria’s Purchase Order for Optimized Pepperoni Seasoning, Purchase Order #PO114081, Sales Order #1000517391, Invoice #649815, Purchase Order Date: 2/13/12, Invoice Date: 3/06/12, Ship Date: 3/06/12 (LIGURIA/GRIFF000373-377)	A			
75C	Liguria’s Purchase Order for Optimized Pepperoni Seasoning, Purchase Order #PO114269, Sales Order #1000518114, Invoice #650156, Purchase Order Date: 2/23/12, Invoice Date: 3/12/12, Ship Date: 3/12/12 (LIGURIA/GRIFF000378-382)	A			
75D	Liguria’s Purchase Order for Optimized Pepperoni Seasoning, Purchase Order #PO114493, Sales Order #100518982, Invoice #650689, Purchase Order Date: 3/08/12, Invoice Date: 3/21/12, Ship Date: 3/21/12 (LIGURIA/GRIFF000383-387)	A			
75E	Liguria’s Purchase Order for Optimized Pepperoni Seasoning, Purchase Order #PO117385, Sales Order #1000531597, Invoice #663299, Purchase	A			



	Order Date: 9/13/12, Invoice Date: 10/08/12, Ship Date: 10/08/12 (LIGURIA/GRIFF000388-392)				
75F	Liguria's Purchase Order for Optimized Pepperoni Seasoning, Purchase Order #PO117615, Sales Order #1000531069, Invoice #664011, Purchase Order Date: 9/27/12, Invoice Date: 10/18/12, Ship Date: 10/18/12 (LIGURIA/GRIFF000393-397)	A			
75G	Liguria's Purchase Order for Optimized Pepperoni Seasoning, Purchase Order #PO117774, Sales Order #1000531904, Invoice #664753, Purchase Order Date: 10/08/12, Invoice Date: 10/29/12, Ship Date: 10/29/12 (LIGURIA/GRIFF000398-402)	A			
75H	Liguria's Purchase Order for Optimized Pepperoni Seasoning, Purchase Order #PO114640, Sales Order #1000519434, Invoice #6511 85, Purchase Order Date: 3/16/12, Invoice Date: 3/28/12, Ship Date: 3/28/12 (LIGURIA/GRIFF000403-408)	A			
75I	Liguria's Purchase Order for Optimized Pepperoni Seasoning, Purchase Order #PO114641, Sales Order #1000519439, Invoice #651631, Purchase Order Date: 3/16/12, Invoice Date: 4/04/12, Ship Date: 4/04/12 (LIGURIA/GRIFF000409-414)	A			
75J	Liguria's Purchase Order for Optimized Pepperoni Seasoning, Purchase Order #PO114740, Sales Order #1000519871, Invoice #652464, Purchase Order Date: 3/23/12, Invoice Date: 4/12/12, Ship Date: 4/12/12 (LIGURIA/GRIFF000415-420)	A			
75K	Liguria's Purchase Order for Optimized Pepperoni Seasoning, Purchase Order #PO114911, Sales Order #1000520548, Invoice #652877, Purchase Order Date: 4/04/12, Invoice Date: 4/24/12, Ship Date: 4/24/12 (LIGURIA/GRIFF000421-425)	A			
75L	Liguria's Purchase Order for Optimized Pepperoni Seasoning, Purchase Order #PO115043, Sales Order #1000521156, Invoice #653416, Purchase Order Date: 4/16/12, Invoice Date: 5/01/12, Ship Date: 5/01/12 (LIGURIA/GRIFF000426-430)	A			

75M	Liguria's Purchase Order for Optimized Pepperoni Seasoning, Purchase Order #PO115130, Sales Order #1000521426, Invoice #653689, Purchase Order Date: 4/19/12, Invoice Date: 5/07/12, Ship Date: 5/07/12 (LIGURIA/GRIFF000431-435)	A			
75N	Liguria's Purchase Order for Optimized Pepperoni Seasoning, Purchase Order #PO115387, Sales Order #1000522470, Invoice #654777, Purchase Order Date: 5/07/12, Invoice Date: 5/23/12, Ship Date: 5/23/12 (LIGURIA/GRIFF000436-440)	A			
75O	Liguria's Purchase Order for Optimized Pepperoni Seasoning, Purchase Order #PO115542, Sales Order #1000523106, Invoice #655249, Purchase Order Date: 5/17/12, Invoice Date: 5/31/12, Ship Date: 5/31/12 (LIGURIA/GRIFF000441-445)	A			
75P	Liguria's Purchase Order for Optimized Pepperoni Seasoning, Purchase Order #PO115619, Sales Order #1000523494, Invoice #655901, Purchase Order Date: 5/25/12, Invoice Date: 6/12/12, Ship Date: 6/12/12 (LIGURIA/GRIFF000446-450)	A			
75Q	Liguria's Purchase Order for Optimized Pepperoni Seasoning, Purchase Order #PO115795, Sales Order #1000524316, Invoice #656494, Purchase Order Date: 6/08/12, Invoice Date: 6/20/12, Ship Date: 6/20/12 (LIGURIA/GRIFF000451-455)	A			
75R	Liguria's Purchase Order for Optimized Pepperoni Seasoning, Purchase Order #PO115796, Sales Order #1000524317, Invoice #657009, Purchase Order Date: 6/08/12, Invoice Date: 6/28/12, Ship Date: 6/28/12 (LIGURIA/GRIFF000456-460)	A			
75S	Liguria's Credit Memo for Optimized Pepperoni Seasoning, Credit Memo #CM655901, Purchase Order #PO115619, Sales Order #1000523494, Credit Memo Date: 6/18/12 (LIGURIA/GRIFF000461)	A			
75T	Liguria's Purchase Order for Optimized Pepperoni Seasoning, Purchase Order #PO115923, Sales Order #1000524836, Invoice #657601, Purchase Order Date: 6/15/12, Invoice Date: 7/09/12, Ship Date: 7/09/12	A			

	(LIGURIA/GRIFF000462-466; Windecker Dep. Ex. 29)				
75U	Liguria's Purchase Order for Optimized Pepperoni Seasoning, Purchase Order #PO116074, Sales Order #1000525423, Invoice #658175, Purchase Order Date: 6/27/12, Invoice Date: 7/18/12, Ship Date: 7/18/12 (LIGURIA/GRIFF000467-471)	A			
75V	Liguria's Purchase Order for Optimized Pepperoni Seasoning, Purchase Order #PO116215, Sales Order #1000525892, Invoice #658879, Purchase Order Date: 7/06/12, Invoice Date: 7/30/12, Ship Date: 7/30/12 (LIGURIA/GRIFF000472-476)	A			
75W	Liguria's Purchase Order for Optimized Pepperoni Seasoning, Purchase Order #PO116293, Sales Order #1000526298, Invoice #659398, Purchase Order Date: 7/11/12, Invoice Date: 8/07/12, Ship Date: 8/07/12 (LIGURIA/GRIFF000477-481)	A			
75X	Liguria's Purchase Order for Optimized Pepperoni Seasoning, Purchase Order #PO116452, Sales Order #1000526844, Invoice #659924, Purchase Order Date: 7/20/12, Invoice Date: 8/15/12, Ship Date: 8/15/12 (LIGURIA/GRIFF000482-486)	A			
75Y	Liguria's Purchase Order for Optimized Pepperoni Seasoning, Purchase Order #PO116782, Sales Order #1000528105, Invoice #660347, Purchase Order Date: 8/09/12, Invoice Date: 8/22/12, Ship Date: 8/22/12 (LIGURIA/GRIFF000487-491)	A			
75Z	Liguria's Purchase Order for Optimized Pepperoni Seasoning, Purchase Order #PO116844, Sales Order #1000528453, Invoice #660852, Purchase Order Date: 8/15/12, Invoice Date: 8/30/12, Ship Date: 8/30/12 (LIGURIA/GRIFF000492-496)	A			
75 AA	Liguria's Purchase Order for Optimized Pepperoni Seasoning, Purchase Order #PO116988, Sales Order #1000528978, Invoice #661321, Purchase Order Date: 8/23/12, Invoice Date: 9/06/12, Ship Date: 9/06/12 (LIGURIA/GRIFF000497-501)	A			
75 BB	Liguria's Purchase Order for Optimized Pepperoni Seasoning, Purchase Order #PO117046, Sales	A			

	Order #1000529156, Invoice #661863, Purchase Order Date: 8/27/12, Invoice Date: 9/17/12, Ship Date: 9/07/12 (LIGURIA/GRIFF000502-506)				
75 CC	Liguria's Purchase Order for Optimized Pepperoni Seasoning, Purchase Order #PO117258, Sales Order #1000529815, Invoice #662363, Purchase Order Date: 9/07/12, Invoice Date: 9/24/12, Ship Date: 9/24/12 (LIGURIA/GRIFF000507-511)	A			
75 DD	Liguria's Purchase Order for Optimized Pepperoni Seasoning, Purchase Order #PO117775, Sales Order #1000531905, Invoice #665137, Purchase Order Date: 10/08/12, Invoice Date: 11/05/12, Ship Date: 11/05/12 (LIGURIA/GRIFF000512-516)	A			
75 EE	Liguria's Purchase Order for Optimized Pepperoni Seasoning, Purchase Order #PO118083, Sales Order #1000532863, Invoice #665612, Purchase Order Date: 10/25/12, Invoice Date: 11/13/12, Ship Date: 11/13/12 (LIGURIA/GRIFF000517-522)	A			
75 FF	Liguria's Purchase Order for Optimized Pepperoni Seasoning, Purchase Order #PO118242, Sales Order #1000533476, Invoice #666514, Purchase Order Date: 11/05/12, Invoice Date: 11/27/12, Ship Date: 11/27/12 (LIGURIA/GRIFF000523-527)	A			
75 GG	Liguria's Purchase Order for Optimized Pepperoni Seasoning, Purchase Order #PO118439, Sales Order #1000534211, Invoice #666953, Purchase Order Date: 11/15/12, Invoice Date: 12/04/12, Ship Date: 12/04/12 (LIGURIA/GRIFF000528-532)	A			
75 HH	Liguria's Purchase Order for Optimized Pepperoni Seasoning, Purchase Order #PO118554, Sales Order #1000534572, Invoice #667713, Purchase Order Date: 11/23/12, Invoice Date: 12/17/12, Ship Date: 12/17/12 (LIGURIA/GRIFF000533-537)	A			
75 II	Liguria's Purchase Order for Optimized Pepperoni Seasoning, Purchase Order #PO119386, Sales Order #1000537542, Invoice #670460, Purchase Order Date: 1/17/13, Invoice Date: 2/04/13, Ship Date: 2/04/13 (LIGURIA/GRIFF000538-542)	A			

75 JJ	Liguria's Purchase Order for Optimized Pepperoni Seasoning, Purchase Order #PO119625, Sales Order #1000538953, Invoice #670975, Purchase Order Date: 1/31/13, Invoice Date: 2/13/13, Ship Date: 2/13/13 (LIGURIA/GRIFF000543-546)	A			
75 KK	Liguria's Purchase Order for Optimized Pepperoni Seasoning, Purchase Order #PO118768, Sales Order #1000535334, Invoice #668501, Purchase Order Date: 12/07/12, Invoice Date: 1/02/13, Ship Date: 1/02/13 (LIGURIA/GRIFF000547-551)	A			
75 LL	Liguria's Purchase Order for Optimized Pepperoni Seasoning, Purchase Order #PO119541, Sales Order #1000538095, Invoice #670173, Purchase Order Date: 1/28/13, Invoice Date: 1/29/13, Ship Date: 1/29/13 (LIGURIA/GRIFF000552-557)	A			
75 MM	Liguria's Purchase Order for Optimized Pepperoni Seasoning, Purchase Order #PO119272, Sales Order #1000537072, Invoice #670049, Purchase Order Date: 1/10/13, Invoice Date: 1/28/13, Ship Date: 1/28/13 (LIGURIA/GRIFF000558-562)	A			
75 NN	Liguria's Purchase Order for Optimized Pepperoni Seasoning, Purchase Order #PO119190, Sales Order #1000536751, Invoice #669373, Purchase Order Date: 1/05/13, Invoice Date: 1/16/13, Ship Date: 1/16/13 (LIGURIA/GRIFF000563-567)	A			
75 OO	Liguria's Purchase Order for Optimized Pepperoni Seasoning, Purchase Order #PO119100, Sales Order #1000536452, Invoice #668863, Purchase Order Date: 1/02/13, Invoice Date: 1/08/13, Ship Date: 1/08/13 (LIGURIA/GRIFF000568-571)	A			
75 PP	Liguria's Purchase Order for Optimized Pepperoni Seasoning, Purchase Order #PO118903, Sales Order #1000535708, Invoice #668864, Purchase Order Date: 12/14/12, Invoice Date: 1/08/13, Ship Date: 1/08/13 (LIGURIA/GRIFF000572-575)	A			
76	1993 Griffith's Mixer Operations Manual (GLAB003090-3124; Neill Dep. Ex. 4)	A			
77	Liguria's Purchase Order for Optimized Pepperoni Seasoning, Purchase Order #PO122136, Sales	A			

	Order #11000549175, Invoice #682175, Invoice Date: 8/20/13, Ship Date: 8/20/13 (GLAB0003129; Woods Dep. Ex. 7)				
78	Liguria's Purchase Order for Optimized Pepperoni Seasoning, Purchase Order #PO122435, Sales Order #1000550250, Invoice #683123, Invoice Date: 9/05/13, Ship Date: 9/05/13 (GLAB0003130; Woods Dep. Ex. 7)	A			
79	Liguria's Purchase Order for Optimized Pepperoni Seasoning, Purchase Order #PO122618, Sales Order #1000550889, Invoice #684308, Invoice Date: 9/24/13, Ship Date: 9/24/13 (GLAB0003131; Woods Dep. Ex. 7)	A			
80	Liguria's Purchase Order for Optimized Pepperoni Seasoning, Purchase Order #PO123017, Sales Order #1000552657, Invoice #685181, Invoice Date: 10/09/13, Ship Date: 10/09/13 (GLAB0003132; Woods Dep. Ex. 7)	A			
81	Liguria's Purchase Order for Optimized Pepperoni Seasoning, Purchase Order #PO123183, Sales Order #1000553285, Invoice #686484, Invoice Date: 10/29/13, Ship Date: 10/29/13 (GLAB0003133; Woods Dep. Ex. 7)	A			
82	Liguria's Purchase Order for Optimized Pepperoni Seasoning, Purchase Order #PO123286, Sales Order #1000553709, Invoice #686987, Invoice Date: 11/06/13, Ship Date: 11/06/13 (GLAB0003134; Woods Dep. Ex. 7)	A			
83	Liguria's Purchase Order for Optimized Pepperoni Seasoning, Purchase Order #PO125095, Sales Order #1000561590, Invoice #694789, Invoice Date: 3/19/14, Ship Date: 3/19/14 (GLAB0003135; Woods Dep. Ex. 7)	A			
84	Griffith Pepperoni Seasoning History of Formulations (1994-2010) (GLAB000532-535; Lanthrop Dep. Ex. 5; MSJ Resp.)	A			
85*	<b>JOINT EXHIBIT NO. 2</b> (Griffith Pepperoni Seasoning History of Formulations (GLAB000476; Dickey Dep. Ex. 5))				
86	Pepperoni Seasoning 017-0975 (LIGURIA/GRIFF 026334-35; November 10, 2000; MSJ Resp. Ex. 16)	A			
87	Pepperoni Seasoning 017-0975 – Griffith Formula Version Printout (GLAB00413-414; MSJ Resp. Ex. 19)	A			



88	Pepperoni Seasoning 017-0528 – Griffith Formula Version Printout (GLAB000541; MSJ Resp. Ex. 17)	A			
89	Pepperoni Seasoning 017-0542 – Griffith Formula Version Printout (GLAB000540; MSJ Resp. Ex. 18)	A			
90	Griffith Seasoning List – 8 different seasonings and PPM levels of BHA/BHT (GLAB000026; MSJ Resp., Ex. 22)	A			
91	1/12/09 Griffith-Liguria emails, D. Connor – P. Leo and Griffith personnel re: issues w/timely receipt of product (GLAB000693-694; Holt Dep. Ex. 1)	A			
92	1/23/09; 1/14/09 Griffith email: P. Leo to K. Holt re: wet/dry nibs/off-color of 017-0975-02 seasoning (GLAB000691-692; Holt Dep. Ex. 2)	A			
93	3/18/09 Griffith email: K. Adams to K. Holt re: Finished Product Non-Conformance Report, and rework (GLAB000777-79; Adams Dep. Ex. 1)	A			
94	4/2/09 Griffith email: K. Holt to D. Connor of Liguria, re: Revised Pepperoni Seasoning 967-5239 (size/pricing) (GLAB000756-757; Holt Dep. Ex. 6)	A			
95	4/16/09 Griffith internal email re: scheduling Liguria production due to Liguria's rejection, customer angst and profit loss (GLAB000747; Holt Dep. Ex. 7)	A			
96	4/17/09 Griffith-Liguria email D. Connor – Griffith personnel re: PO#101700 (GLAB000818)	A			
97	4/30/09 Griffith-Liguria email D. Connor to D. O'Keefe re: PO#101839 (GLAB000816)	A			
98	[OMITTED]				
99	[OMITTED]				
100	5/8/09, 5/6/09 Griffith-Liguria emails, D. Connor – K. Holt and Griffith personnel re: Canada will not accept spice w/antioxidants; need 10 bags of spice w/no BHA/BHT and only citric acid (GLAB002912-2913)	A			
101	5/20/09 Griffith email: K. Holt to D. Scarbro, re: Revised Pepperoni Seasoning. (967-5239, now 017-1985-00) (GLAB002938-39; Holt Dep. Ex. 8)	A			

102	6/24/09 – 7/2/09 Griffith emails: K. Adams questions to paprika supplier re: changes in extraction process or ingredients used (GLAB000915-17; Adams Dep. Ex. 4; Neill Dep. Ex. 4)	A			
103*	<b>JOINT EXHIBIT NO. 87</b> (7/7/09 – 7/9/09 Griffith-Liguria emails: K. Adams - J. Whitham re: shelf-life of Liguria pepperoni (GLAB002932-2934; Adams Dep. Ex. 5)				
104*	<b>JOINT EXHIBIT NO. 3</b> (7/1/09 – 7/20/09 Griffith internal emails; K. Adams re: shelf-life of Liguria pepperoni (GLAB000884-888; Adams Dep. Ex. 6))				
105*	<b>JOINT EXHIBIT NO. 4</b> (7/1/09 – 7/22/09 Griffith internal emails (GLAB000876-881; Adams Dep. Ex. 7))				
106*	<b>JOINT EXHIBIT NO. 5</b> (7/27/09 – Griffith–Liguria emails: J. Whitham to K. Holt – pepperoni seasoning with Higher Density Capsicum – causes pepperoni to be uniformly darker/redder, too red (GLAB 000874-875; Adams Dep. Ex. 8))				
107*	<b>JOINT EXHIBIT NO. 6</b> (7/27/09 Griffith-Liguria emails, D. Connor – K. Holt, J. Whitham, G. Pearson re: too red of product made w/spice block w/higher capsicum (GLAB002929))				
108	7/30/09 Griffith email: M. DiSanto to K. Holt, re: credit to Liguria re: off-color Pepp. Seasoning (017-0975-02) (GLAB000863; Holt Dep. 11)	A			
109	8/12/09 Griffith email: M. DiSanto to C. Woods re: color issues in Pepp. Seasoning (017-0975-02) (GLAB000851; Holt Dep. Ex. 12)	A			
110	9/02/09 Griffith email: K. Holt to J. Whitham, with attached Memo from D. Bernacchi re: compacting, nibbing, possibly inconsistent blends in 017-0975 (GLAB000833-836; Holt Dep. Ex. 14; Adams Dep. Ex. 11)	A			
111	9/28/09 Griffith-Liguria email, K. Holt to D. Connor re: updated pepperoni pricing effective on 10/26/09 for 017-0975-02 (GLAB000824; Holt Dep. Ex. 15)	A			
112	9/30/09 Griffith email: E. Werth to K. Holt (GLAB00832; Holt Dep. Ex. 16)	A			

113	10/14/09 Griffith-Liguria email, D. Connor – D. O’Keefe, K. Holt re: PO#103692 (GLAB002870)	A			
114	11/09/09 Griffith-Liguria email, D. Connor – K. Holt and D. O’Keefe re: PO#103967 (GLAB002868)	A			
115	11/30/09 to 12/02/09 emails: J. Whitham to K. Adams; and K. Adams / K. Holt (GLAB003082-83; Holt Dep. Ex. 17)	A			
116	11/30/09 to 12/10/09 Griffith emails (GLAB002737-41; Holt Dep. Ex. 18)	A			
117	1/6/10 Griffith Memo from D. Bernacchi to K. Holt re: Liguria Pepperoni, request by Liguria to add more paprika extract (GLAB002705-07; Holt Dep. Ex. 19)	A			
118	1/12/10 Griffith-Liguria emails, K. Adams to J. Whitham, re: 017-0975-02 seasoning (GLAB002697-99; Neill Dep. Ex. 6)	A			
119	1/12/10, 1/14/10 Griffith-Liguria emails, J. Whitham – K. Holt (GLAB003057-3058)	A			
120	1/15/10, 1/29/10 Griffith emails; K. Adams re: 017-0975 seasoning (GLAB002685-2686; Holt Dep. Ex. 20; Neill Dep. Ex. 7)	A			
121	2/12/10 Griffith internal emails; K. Adams re: 017-0975-02 (GLAB003035-37; Adams Dep. Ex. 10)	A			
122	3/2/10 Griffith-Liguria email, A. Lamich – D. Connor and Griffith personnel re: country of origin information for formula 017-2043 and attached Country of Origin Declaration (GLAB002535-2536)	A			
123	3/11/10 Griffith-Liguria emails, D. Connor – G. Pearson, K. Holt re: test batch of 017-0975-02 pepperoni spice, reducing sugar by 5% (GLAB002679)	A			
124	3/15/10, 3/12/10, 3/11/10, 3/4/10 Griffith-Liguria emails, A. Lamich – Griffith and Liguria personnel re: Great Kitchens, Inc’s questions (GLAG002518-2521)	A			
125	3/23/10, 3/16/10 3/10/10 Griffith internal emails K. Adams re: Liguria’s complaint for Lot 72853, Product 01709502 too light; Liguria would prefer not to use the 100 bags of 017-0975 rejected from Lot 72853	A			

	(GLAB003020-3021)				
126	3/7/10 Griffith-Liguria email re: ingredient declarations of 967-9094 (Pepperoni Seasoning w/reduced sugar) and 017-0975 (Pepperoni Seasoning) (GLAB003018)	A			
127	3/31/10 Griffith Letter, E. Werth, to D. Connor re: samples for Liguria's evaluation (GLAB002590)	A			
128	4/20/10 Griffith email; C. Pryor to K. Adams, re: 017-0975-02 Pepperoni Seasoning; Liguria complaint that color of seasoning too light (GLAB003007-08; Holt Dep. Ex. 21)	A			
129	4/19/10 Griffith email and return authorization, Liguria return of 017-0975-02 Pepp. Seasg. due to off color (GLAB003009-10; Holt Dep. Ex. 21)	A			
130	4/23/10, 4/22/10 Griffith-Liguria email, D. Connor – D. O'Keefe re: PO#105894 (GLAB002511-2512)	A			
131	6/2/10, 6/1/10 Griffith-Liguria emails, D. Connor – Griffith personnel re: returning Lot 75322 for being too orange and light & Griffith not accepting returned product (GLAB003002-3003)	A			
132	6/21/10 Griffith email; K. Holt to E. Werth re: reduction of oils in 017-0975; use of 500K Heat Cap (GLAB002665; Holt Dep. Ex. 22)	A			
133*	<b>JOINT EXHIBIT NO. 7</b> (6/24/10 Griffith email; G. Neill to K. Holt re: return from Liguria due to off color of seasoning; (GLAB002663-2664; Holt Dep, Ex. 23))				
134	10/18/10 Griffith-Liguria emails; D. Connor – D. O'Keefe, K. Holt re: PO#107862, PO#107863 (GLAB002824-2825)	A			
135	10/18/10, 10/12/10, Griffith-Liguria emails re: less oil new product is 017-2112 (968-0399 Liguria Pepperoni w/less oil) (GLAB002645-2647)	A			
136	10/21/10 Griffith email: S. Bergman to Don Connor at Liguria re: 017-2112 Optimized Pepperoni Seasoning ("less oil") and Specification (GLAB002639-43; Holt Dep. Ex. 24)	A			
137	10/26/10 Griffith-Liguria email, D. Connor – D. O'Keefe re: PO#107948	A			

	(GLAB002819)				
138	2/21/11 Griffith-Liguria emails, D. Connor – D. O’Keefe re: PO#109400, PO#109401 (GLAB002804-2805)	A			
139*	<b>JOINT EXHIBIT NO. 8</b> (4/28/11 Griffith email: K. Holt to Griffith team, informing Liguria approval of transition to Optimized Pepperoni Seasoning 017-2112-00 from prior formula 017-0975-02 (GLAB002961-2963; Adams Dep. Ex. 13; Dickey Dep. Ex. 4))				
140	8/15/11 Griffith-Liguria emails and internal Griffith emails, J. Saulnier – D. Connor, G. Pearson, Griffith personnel re: series of photos re: ranges of colors for paprika and extractives of paprika (GLAB002976-2978)	A			
141	8/19/11 Griffith-Liguria email, K. Holt – D. Connor, G. Pearson and J. Saulnier re: paprika (GLAB002974-2975)	A			
142	9/19/11 Griffith email, K. Holt – D. Panico re: updated Liguria pricing (GLAB002879-2880; Holt Dep. Ex. 27)	A			
143	9/15/11, 9/6/11, 9/2/11, 8/19/11 Griffith-Liguria emails Liguria personnel – Griffith personnel re: paprika, color chart (GLAB002964-2967)	A			
144	9/23/11 Griffith email, K. Holt – D. Panico re updated price list (GLAB002877; Holt Dep. Ex. 28)	A			
145	10/4/11 Griffith-Liguria email, D. Connor – K. Holt re: updated price list (GLAB002872-2873)	A			
146	10/6/11 Griffith-Liguria email, D. Connor – K. Holt, D. O’Keefe re: head of a bolt in a bag of Griffith spice & photo of bag (GLAB001523-1524)	A			
147	3/16/12 Griffith-Liguria email, D. Connor – D. O’Keefe, K. Holt re: PO#114641 (GLAB001012)	A			
148	3/26/12 Griffith email: D. O’Keefe to Don Connor, Optimized Pepperoni Seasoning, 017-2112, minimum order 305 bags, or 10,000 pounds (GLAB001010-1011; Holt Dep. Ex. 29)	A			
149	5/8/12 Griffith-Liguria email, D. Connor – D. O’Keefe, K. Holt re: speeding up picking up spice	A			

	(GLAB002798)				
150	7/6/12 Griffith-Liguria email, D. Connor – D. O’Keefe, K. Holt re: PO#116215 (GLAB001009)	A			
151*	<b>JOINT EXHIBIT NO. 9</b> (7/18/12 Griffith “Formula Version Printout” for Optimized Pepperoni Seasoning, Local No. 017-2112 (GLAB000021-22; Adams Dep. Ex. 14; Bacus Dep. Ex. 4; Carson Dep. Ex. 7))				
152	8/15/12 Griffith-Liguria email, D. Connor – D. O’Keefe, K. Holt re: PO#116844 (GLAB001008)	A			
153	8/23/12 Griffith-Liguria email, D. Connor – D. O’Keefe re: PO#116988 and PO#116844 (GLAB1006; Holt Dep. Ex. 30)	A			
154	11/16/12 Griffith-Liguria email, K Holt – D. Connor, M. Niday, J. Saulnier, T. Kane re: Griffith’s pricing for the RFP proposal (GLAB001535-1546; Holt Dep. Ex. 32)	A			
155	1/4/13, 1/3/13 Griffith-Liguria emails re: PO#118903 pick-up, Liguria need cure by Wednesday and Griffith’s available products (GLAB0000990-993)	A			
156	1/16/13: Griffith-Liguria emails, J. Whitham & K. Holt (LIGURIA/GRIFF 004629 –4630)	A			
157*	<b>JOINT EXHIBIT NO. 10</b> (1/16/13, 1/18-13: Griffith-Liguria emails, K. Holt & J. Whitham re: product color loss (GLAB001483-1486; Adams Dep. Ex. 16))				
158*	<b>JOINT EXHIBIT NO. 11</b> (1/16/13: Griffith-Liguria emails, E. Werth, K. Holt, M. Warren, L. Windecker, S. Shah; answers to questions re: product color loss (GLAB001494-1496; Sebranek Dep. Ex. 9))				
159	1/17/13 Griffith-Liguria email, J. Saulnier – T. Kane, K. Holt, D. Connor, M. Niday re: incentive proposal calculations and prices (GLAB001533-1534; Holt Dep. Ex. 33)	A			
160*	<b>JOINT EXHIBIT NO. 12</b> (1/22/13, 1/28/13 Griffith Customer Complaint Database, re: Optimized Pepperoni Seasoning 017-2112-00 ) (GLAB001474-1475; Shah Dep. Ex. 22)				
161*	<b>JOINT EXHIBIT NO. 88</b> (1/22/13 Griffith email: K. Adams to J. Whitham (GLAB001483-1486; Adams Dep. Ex. 16)				

162	1/22/13 Griffith-Liguria emails: K. Adams & J. Whitham (LIGURIA/GRIFF 006790-006792)	A			
163*	<b>JOINT EXHIBIT NO. 13</b> (1/25/13 D. Connor to K. Holt email re: product color loss (LIGURIA/GRIFF006802; Connor Dep. Ex. 4))				
164*	<b>JOINT EXHIBIT NO. 14</b> (1/25/13 Griffith-Liguria emails: D. Connor to K. Holt; D. Connor re: product color loss (LIGURIA/GRIFF006803-6804, Connor Dep. Ex. 5))				
165*	<b>JOINT EXHIBIT NO. 15</b> (1/24/13 – 1/25/13 Griffith-Liguria emails; J. Whitham to K. Adams, inquiring re: BHA and BHT results (GLAB001481-1482; Adams Dep. Ex. 17))				
166	1/25/13 Griffith-Liguria emails: J. Whitham inquires re: levels of BHA/BHT at time of production (GLAB001476-77; Adams Dep. Ex. 18)	A			
167*	<b>JOINT EXHIBIT NO. 79</b> (1/30/13 Griffith internal email: K. Adams to Griffith Team, and 1/29/13 test results on complaint vs. target pepperoni (GLAB001459-1473; Adams Dep. Ex. 19)				
168	<b>[OMITTED]</b>				
169	1/31/13, 1/30/13 Griffith email, L. Lanthrop – L. Windecker, D. Bernacchi, M. Warren, K. Adams, D. Portz re: sodium content of Liguria pepperoni results (GLAB000527; Lanthrop Dep. Ex. 5)	A			
170	2/4/13 Liguria email from J. Saulnier to J. Whitham (LIGURIA/GRIFF 004796)	A			
171	2/4/13 Griffith-Liguria email: K. Adams to J. Whitham, re: Liguria Pepperoni Analysis (LIGURIA/GRIFF 002015-002017)	A			
172	2/6/13 Griffith-Liguria email: J. Whitham to K. Adams (LIGURIA/GRIFF 002018-002019)	A			
173	2/4/13 – 2/6/13 Griffith-Liguria emails between J. Whitham and K. Adams re: add'l Griffith seasoning products for BHA & BHT testing (LIGURIA/GRIFF005822-005824)	A			
174*	<b>JOINT EXHIBIT NO. 78</b> (2/4/13 - 2/8/13 Griffith-Liguria emails: J. Whitham to K. Adams re: levels of antioxidants; K. Adams to J.				



	Whitham: identifying 7 types of seasoning to include BHA/BHT testing (GLAB01444-1452; Adams Dep. Ex. 21)				
175*	<b>JOINT EXHIBIT NO. 16</b> (2/8/13 – 2/14/13 Griffith-Liguria emails: K. Adams & J. Whitham re: BHA/BHT levels (GLAB001417-1422; Adams Dep. Ex. 24; Shah Dep. Ex. 27))				
176*	<b>JOINT EXHIBIT NO. 17</b> (2/8/13 – 2/13/13 Griffith-Liguria emails: K. Adams to J. Whitham, describes differences between 0170975 and 0172112 (GLAB001423-1427; Adams Dep. Ex. (24A?))				
177	2/8/13 Griffith-Liguria email, K. Adams to J. Whitham, re: update on analytical data re: pepperoni field samples (LIGURIA/GRIFF 001311-15; Adams Dep. Ex. 24B)	A			
178	2/8/13 Griffith email, L. Lathrop – Griffith personnel re: updated Liguria pepperoni analyticals w/heavy metal data and rancidity (GLAB000418; Lathrop Dep. Ex. 8)	A			
179	2/12/13 Griffith Updated Liguria Pepperoni Analysis (LIGURIA/GRIFF 002024-2026)	A			
180	2/12/13 – 2/13/13 Griffith email, K. Adams update re: Liguria pepperoni (LIGURIA/GRIFF 005604-5608)	A			
181	2/13/13 – 2/14/14 Griffith email, K. Adams BHA/BHT testing range (LIGURIA/GRIFF 005611-005617)	A			
182*	<b>JOINT EXHIBIT NO. 18</b> (2/20/13 Griffith-Liguria email, K. Adams to J. Whitham (LIGURIA/GRIFF002032-2033))				
183	2/20/13 Liguria email, J. Whitham & S. Seavey (LIGURIA/GRIFF 015258-15259)	A			
184	2/21/13, 2/20/13 Griffith email re: fatty acids test results before making formulation changes (GLAB001414-1415; Holt Dep. Ex. 47)	A			
185*	<b>JOINT EXHIBIT NO. 19</b> (2/22/13 Liguria email, J. Whitham, re: addition of rosemary (LIGURIA/GRIFF017152))				
186	2/26/13 Griffith-Liguria email, L. Windecker to J. Whitham, re: evolution of seasoning since 1995 (LIGURIA/GRIFF 005979 – 005980)	A			

187	2/26/13 Griffith-Liguria email, L. Windecker to J. Whitham (LIGURIA/GRIFF 005976-5978)	A			
188	(2/28/13, 3/1/13 Liguria email, J. Whitham and Prof. Jim Dickson, ISU (LIGURIA/GRIFF 015354 – 015355))	A			
189	3/1/13 Liguria email, J. Saulnier to J. Henry, re: customer complaint from Roma re: yellow/rancid smelling pepperoni (LIGURIA/GRIFF018867)	A			
190*	<b>JOINT EXHIBIT NO. 21</b> (3/4/13 Griffith email, L. Windecker – K. Holt re: Sample Request Form for Liguria’s Opt Pepp Seas-35, Opt Pepp Seas-38, Opt Pepp Seas-40, Opt Pepp Seas-45 (GLAB001965-1968; Windecker Dep. Ex 23))				
191	3/4/13 Liguria email, Prof. Jim Dickson, ISU, to J. Whitham (LIGURIA/GRIFF 001445; Sebranek Dep. Ex. 8)	A			
192*	<b>JOINT EXHIBIT NO. 22</b> (3/5/13 Griffith-Liguria email, L. Windecker to J. Whitham (GLAB001399-1403; Adams Dep., Ex. 25))				
193*	<b>JOINT EXHIBIT NO. 77</b> (3/5/13 – 3/6/13 Griffith-Liguria emails, K. Adams and J. Whitham, re: Griffith and ABC Labs testing results re: BHA/BHT (LIGURIA/GRIFF002037-2039))				
194*	<b>JOINT EXHIBIT NO. 63</b> (3/6/13 Griffith-Liguria email, J. Whitham to L. Windecker (GLAB001394-1408; Adams Dep. Ex. 25; Milkowski Dep. Ex. 6)				
195	3/7/13 Griffith email, K. Adams to K. Holt, J. Rathburn re: review of formulations of Old Pepperoni Spice and Optimized Pepperoni Spice (GLAB001924; Neill Dep. Ex. 14)	A			
196	3/7/13 Griffith-Liguria email, D. Connor to K. Holt re: discontinue Optimized Pepperoni Seasoning 017-2112 (LIGURIA/GRIFF005627)	A			
197	3/7/13 Griffith-Liguria email, K. Holt to D. Connor (LIGURIA/GRIFF 005628-5629)	A			
198	3/7/13, Liguria email, J. Saulnier to D. Connor, re: pepperoni discoloration (LIGURIA/GRIFF 014814; Hawthorne Dep. Ex. 18)	A			

199	3/8/13 Liguria email, D. Connor to J. Saulnier (LIGURIA/GRIFF 015855)	A			
200*	<b>JOINT EXHIBIT NO. 23</b> (3/7/13 – 3/8/13 Liguria email, J. Whitham to Prof. Jim Dickson, and cc: Prof. Sebranek re: anti-caking (LIGURIA/GRIFF014821))				
201*	<b>JOINT EXHIBIT NO. 24</b> (3/8/13 Griffith internal email, L. Windecker to Griffith team re: DDGS and Silliker data (GLAB001391-1393; Adams Dep. Ex. 26))				
202*	<b>JOINT EXHIBIT NO. 69</b> (Undated Griffith email, L. Windecker to Dr. Jim Bacus, initially informing him re: pepperoni issue (JBACUS000007-9; Bacus Dep. Ex. 6))				
203*	<b>JOINT EXHIBIT NO. 68</b> (3/11/13 Griffith – Dr. Jim Bacus emails; L. Windecker email to Dr. Bacus (JBACUS000005-000006; Bacus Dep. Ex. 5))				
204*	<b>JOINT EXHIBIT NO. 25</b> (3/11/13 Griffith memo; summary by K. Adams re: Griffith Pepperoni Seasoning 017-2112-00; 1/16/13 to 3/11/13 (GLAB001380-1390; Adams Dep. Ex. 27; G. Neill Dep. Ex. 16; Shah Dep. Ex. 28))				
205	3/11/13 Griffith-Liguria email, K. Adams to J. Whitham re: DDGS (LIGURIA/GRIFF006893-6896)	A			
206	3/14/13 Griffith PPT presentation: Liguria Pepperoni Situation Working Session (GLAB000374-389; Adams Dep. Ex. 32; Lathrop Dep. Ex. 20)	A			
207*	<b>JOINT EXHIBIT NO. 26</b> (3/14/13 Griffith’s “Liguria Trip Report – 3/14/13” (by K. Adams) (GLAB000478-481; Adams Dep. Ex. 34A; Bacus Dep. Ex. 8; Carson Dep. Ex. 14; Hawthorne Dep. Ex. 16))				
208	3/15/13 Griffith email, R. Barkowski – K. Holt, C. Woods, D. Scarbro re: summary of financials (GLAB001330; Holt Dep. Ex. 56)	A			
209*	<b>JOINT EXHIBIT NO. 27</b> (3/15/13, 3/13/13 Liguria – Griffith emails, G. Neill and Griffith personnel re: salt and rosemary booster bag and Griffith’s payment of booster bags (GLAB001331-1332; Neill Dep. Ex. 21))				
210	3/15/13, 3/14/13, 3/13/13 Liguria – Griffith emails re: salt and rosemary booster bag and Griffith’s	A			

	hope for better direction after results from tests on antioxidants released (GLAB001333 –1334; Neill Dep. Ex. 22)				
211*	<b>JOINT EXHIBIT NO. 60</b> (3/13/13 Griffith internal email, from C. Carr to Griffith personnel re: Powerpoint for meeting at Liguria on 3/14/13 (GLAB001342-1359)				
212*	<b>JOINT EXHIBIT NO. 28</b> (3/18/13 Griffith “Sales Call Report” by Kent Holt (re: 3/14/13 meeting) (GLAB002346-2347; Adams Dep. Ex. 35; Bacus Dep. Ex. 9))				
213	3/18/13 Griffith internal email re: “Liguria Revised Pepperoni w/Rosemary” (GLAB001323-1324; Adams Dep. Ex. 36)	A			
214*	<b>JOINT EXHIBIT NO. 29</b> (3/18/13 Griffith internal email re: Liguria Trip Report to Griffith (GLAB001325-1329; Sebranek Dep. Ex. 20; Adams Dep. Ex. 34B))				
215*	<b>JOINT EXHIBIT NO. 30</b> (3/21/13 Griffith internal email, Amy Jones, VP Prod. Dvlpt., to team, lists 13 next steps to team re: BHA/BHT (GLAB000459; Adams Dep. Ex. 39))				
216*	<b>JOINT EXHIBIT NO. 31</b> (3/21/13 Griffith email, L. Lanthrop – Griffith personnel re: analysis of samples (GLAB000465; Lathrop Dep. Ex. 23))				
217	3/21/13 Griffith email/memo, K. Adams email and memo to J. Whitham (LIGURIA/GRIFF 005768-5773)	A			
218*	<b>JOINT EXHIBIT NO. 32</b> (3/21/13 Griffith email/memo, K. Adams email and memo to J. Whitham (GLAB001317-1322; Adams Dep. Ex. 38))				
219	3/22/13 Griffith internal email re: pepperoni codes (GLAB001314; Neill Dep. Ex. 27; Holt Dep. Ex. 61)	A			
220	3/22/13 Griffith internal email re: not processing pepperoni seasoning or booster packs unless approval from Griffith and Liguria (GLAB001313; Woods Dep. Ex. 19)	A			
221	3/26/13 Griffith email, C. Woods to J. Saulnier and Griffith personnel re: scheduling meeting to review progress on behalf of Griffith and Liguria for testing (GLAB001305; Woods Dep. Ex. 20)	A			

222*	<b>JOINT EXHIBIT NO. 33</b> (3/27/13 Griffith internal email, K. Adams to Griffith team, re: “Liguria Root Cause Analysis” (GLAB001299-1304; Adams Dep. Ex. 44; Sebranek Ex. 15; Adams Dep. Ex. 44))				
223	3/27/13, 3/25/13 Griffith-Liguria emails re: Liguria’s Root Cause Analysis (GLAB001290-1292; Woods Dep. Ex. 22)	A			
224	3/27/13 – 4/1/13 Griffith-Liguria emails re: Rosemary Booster Bags (LIGURIA/GRIFF015511-15514)	A			
225	3/27/13 Griffith email, R. Barkowski – K. Holt, C. Woods, D. Scarbro re: supplier of Rosemary OR, Naturex, and pricing (GLAB001293-1298; Holt Dep. Ex. 64)	A			
226*	<b>JOINT EXHIBIT NO. 34</b> (4/1/13 Griffith-Liguria email, K. Holt – C. Woods, D. Connor – K. Holt re: if Liguria returning to original formulation (GLAB000978-979; Holt Dep. Ex. 66))				
227*	<b>JOINT EXHIBIT NO. 35</b> (4/5/13, Griffith internal email, K. Holt to C. Woods, C. Carr re: summary of conference call w/Liguria (GLAB001277-1278; Saulnier Dep. Ex. 18))				
228*	<b>JOINT EXHIBIT NO. 36</b> (4/8/13, Griffith-Liguria email; K. Holt to J. Saulnier, C. Woods re: Liguria formulation history for pepperoni seasonings & attachment (GLAB001528-1529; Saulnier Dep. Ex. 19; Woods Dep. Ex. 25))				
229	4/9/13, Griffith email, D. Portz to Dr. Jim Bacus, re: Griffith memorandum tracing Liguria raw materials (GLAB 001269 – 001276; Adams Dep. Ex. 45; Portz Dep. Ex. 9)	A			
230*	<b>JOINT EXHIBIT NO. 52</b> (4/9/13 Liguria emails, D. Connor to J. Saulnier, re: Rosemary Booster Bags (LIGURIA/GRIFF 015816-15818))				
231	4/12/13 Griffith internal email re: correct pepperoni formula 017-0975 (GLAB001261-1262; Woods Dep. Ex. 26)	A			
232	4/12/13 Griffith-Liguria emails, J. Saulnier to C. Woods, re: Pepperoni Seasoning (LIGURIA/GRIFF017164-17165)	A			
233	4/12/13 Griffith-Liguria emails; J. Saulnier & C. Woods	A			

	(LIGURIA/GRIFF 015359; Saulnier Dep. Ex. 21)				
234	4/12/13, 2/28/13, 2/21/13 Griffith internal email re: pricing of Optimized Pepperoni Seasoning w/rosemary booster bags (GLAB001255-1257; Neill Dep. Ex. 34; Woods Dep. Ex. 28; Holt Dep. Ex. 69)	A			
235	4/12/13 Griffith-Liguria emails; J. Saulnier & C. Woods (GLAB001258-1259; Woods Dep. Ex. 27)	A			
236	4/15/13 Griffith-Liguria emails, S. Bergman – J. Whitham and Griffith personnel re: product information for 017-2368 Optimized Plus Pepperoni Seasoning w/range formula removed & attached Allergen Information and Temporary Specification (GLAB002103-2105)	A			
237*	<b>JOINT EXHIBIT NO. 37</b> (4/16/13 Griffith Memorandum, D. Portz to J. Saulnier (LIGURIA/GRIFF 005640-5644; Saulnier Dep. Ex. 22; Carson Dep. Ex. 18))				
238	4/16/13 Liguria email, J. Saulnier attaching D. Portz Memorandum and K. Holt information re: Opt. Plus Pepp. Seasoning (017-2368) (LIGURIA/GRIFF 005639-005647)	A			
239	4/19/13, 4/16/13 Griffith email, C. Woods – Griffith personnel re: notes on testing for Liguria based on J. Saulnier email (GLAB000349-354; Lathrop Dep. Ex. 27; Portz Dep. Ex. 11)	A			
240	4/19/13 Liguria email, J. Saulnier to K. Holt & C. Woods (LIGURIA/GRIFF 005688-5690; Saulnier Dep. Ex. 25; Carson Dep. Ex. 19)	A			
241	4/19/13 Griffith email, C. Woods to J. Saulnier (LIGURIA/GRIFF 006977-6980)	A			
242*	<b>JOINT EXHIBIT NO. 38</b> (4/26/13 Griffith Memorandum, D. Portz to J. Saulnier GLAB000237-242; Saulnier Dep. Ex. 26; Carson Dep. Ex. 20)				
243	4/29/13 Griffith email L. Lathrop – Griffith personnel re: Griffith analyticals of carnosic acid levels in 017-2368 (GLAB000234; Lathrop Dep. Ex. 28; Windecker Dep. Ex. 53)	A			
244	4/30/13 Liguria email, J. Saulnier internal email re: Griffith	A			

	(LIGURIA/GRIFF015082-15086)				
245	4/30/13 Liguria email, J. Whitham to J. Saulnier (LIGURIA/GRIFF015087)	A			
246	4/30/13 Liguria email, D. Connor to Griffith personnel re: Rosemary Booster Bags (LIGURIA/GRIFF 015838)	A			
247	4/30/13, 4/25/13 Griffith email, D. Portz – Griffith and J. Bacus re: reviewing Rancimat Test w/Liguria & Rancimat Testing attachment (GLAB001228-1232; Portz Dep. Ex. 15)	A			
248	5/2/13 Griffith-Liguria email, K. Holt to D. Connor re: Rosemary Booster Bags (LIGURIA/GRIFF015842-15843)	A			
249	5/2/13 Griffith-Liguria email, K. Holt to D. Connor re: Rosemary Booster Bags (GLAB001214; Holt Dep. Ex. 73)	A			
250	5/2/13 Griffith-Liguria email, S. Shah to J. Whitham re: Certificate of Analysis re: 017-2368 Optimized Plus Seasoning (LIGURIA/GRIFF015092-15093)	A			
251	5/3/13 Griffith internal email, L. Windecker – D. Diez de Medina, K. Holt re: BOR for liquid pepperoni formula, creating sample & attached BOR for revise 017-2112 (017-2368) as a dry seasoning and liquid seasoning pack option (GLAB002016-2018)	A			
252	5/3/13 Griffith-Liguria email, D. Connor Seasoning Purchase Order (LIGURIA/GRIFF007028)	A			
253	5/6/13 Liguria email, J. Saulnier to J. Whitham (LIGURIA/GRIFF015099-015100)	A			
254	5/6/13 Email from J. Bacus to J. Saulnier re: Carnosic Acid / Rosemary (LIGURIA/GRIFF 017204-17206; Bacus Dep. Ex. 20)	A			
255	5/6/13 Griffith-Liguria email, D. Portz to J. Saulnier, re: “Follow Up Points to Liguria Team” (LIGURIA/GRIFF01501-1502)	A			
256	5/6/13 Griffith-Liguria email, D. Portz to J. Saulnier, re: “Follow Up Points to Liguria Team” (GLAB001212-1213; Neill Dep. Ex. 35; Portz Dep. Ex. 17)	A			
257*	<b>JOINT EXHIBIT NO. 39</b> (5/7/13 Griffith email, K. Holt to C. Woods re: conversations w/Liguria and J. Saulnier (GLAB001208-1209; Woods Dep. Ex. 35; Holt Dep. Ex. 74))				



258	5/12/13 Liguria email, J. Saulnier to personnel, re: rough time line of events (LIGURIA/GRIFF002261-2263)	A			
259*	<b>JOINT EXHIBIT NO. 40</b> (5/12/13 Liguria email, J. Saulnier to personnel, re: rough time line of events (LIGURIA/GRIFF014980-14982; Saulnier Dep. Ex. 28))				
260*	<b>JOINT EXHIBIT NO. 80</b> 5/12/13 Griffith, Liguria email, D. Portz – J. Saulnier, J. Bacus, K. Holt re: Rancimat Testing Summary produced by Griffith (GLAB01197-1206; Lathrop Dep. Ex. 30; Portz Dep. Ex. 20)				
261	5/15/13 Liguria email and ABC Research Labs to J. Whitham (LIGURIA/GRIFF 015119-15126)	A			
262	5/17/13 Griffith-Liguria email, D. Portz to J. Saulnier (LIGURIA/GRIFF 007051-7053)	A			
263	<b>[OMITTED]</b>				
264*	<b>JOINT EXHIBIT NO. 51</b> (5/17/13 Liguria memo, J. Whitham to J. Saulnier, re: Sam's Club (LIGURIA/GRIFF002411-2417)				
265	5/17/13 Liguria memo, J. Whitham to J. Saulnier, re: Sam's Club (LIGURIA/GRIFF 002428-2429)	A			
266	5/22/13, 5/21/13, 5/17/13, 5/8/13 Griffith email, re: pricing analysis of Liguria two-pack system, liquid pepperoni (GLAB001992-1995; Holt Dep. Ex. 78)	A			
267	5/23/13 Griffith-Liguria email, K. Holt – J. Saulnier, D. Connor, Griffith personnel re: pricing for two part pepperoni seasoning for dry and liquid seasonings, additional cost & attached pricing (GLAB002156-2157)	A			
268	<b>[OMITTED]</b>				
269	6/3/13 Griffith – Dr. Bacus emails; D. Portz, inquiry re: formulating at 30-35 ppm BHA/BHT and Bacus response (GLAB001174-76; Bacus Dep. Ex. 24; Portz Dep. Ex. 29)	A			
270	6/3/13 Griffith email, D. Portz – Griffith personnel re: answers to questions re: Rancimat Testing (GLAB001177-1178; Portz Dep. Ex. 28)	A			

271*	<b>JOINT EXHIBIT NO. 50</b> (6/3/13 Liguria email, J. Saulnier to J. Peter Clark (LIGURIA/GRIFF 014331-14337))				
272	6/6/13 Griffith-Liguria email, J. Saulnier to K. Holt (LIGURIA/GRIFF 018786-018788)	A			
273	6/6/13 Griffith-Liguria email, J. Saulnier – K. Holt, J. Whitham – D. Portz re: timing for additional testing for Rancimat (GLAB000966-967; Portz Dep. Ex. 26)	A			
274	6/7/13 Liguria email, J. Whitham to Liguria personnel re: clumps in Pepperoni Seasoning (LIGURIA/GRIFF 018790-18791)	A			
275	6/7/13 Griffith-Liguria email, K. Holt to J. Whitham (LIGURIA/GRIFF 018792)	A			
276	6/13/13 Griffith-Liguria email, D. Connor to D. O’Keefe and K. Holt, re: Liguria Purchase Order (LIGURIA/GRIFF 016646)	A			
277	6/14/13 Griffith-Liguria email, D. Portz to K. Holt and Liguria personnel re: calculations for BHA/BHT and Rancimat Testing Samples (GLAB001144-1147)	A			
278	6/15/13 Liguria email, J. Saulnier to J. Whitham; J. Christopherson; J. Bacus; J. Peter Clark re: Griffith BHA/BHT levels (LIGURIA/GRIFF 015150-015151; Saulnier Dep. Ex. 31; Bacus Dep. Ex. 26)	A			
279	6/17/13 J. Bacus email re: Griffith’s rounding of BHA/BHT amounts (LIGURIA/GRIFF 004389-4395; Bacus Dep. Ex. 27; Sebranek Dep. Ex. 18)	A			
280	6/17/13 Griffith-Liguria email, J. Saulnier to D. Portz (LIGURIA/GRIFF 017219 – 17221)	A			
281	6/17/13 Griffith-Liguria email, J. Saulnier to D. Portz re: how much BHA/BHT being added (GLAB001139-1140; Portz Dep. Ex. 33)	A			
282	6/17/13 Liguria email, D. Connor to J. Saulnier, update re: Frozen 80’s and hold on purchases (LIGURIA/GRIFF016647-16649)	A			
283	6/17/13 Griffith-Liguria email, J. Whitham to Griffith personnel re: BHA/BHT limits (LIGURIA/GRIFF 007056-7058)	A			
284	6/17/13 Griffith-Liguria emails, J. Whitham to D. Portz, re: BHA/BHT (GLAB000068-69; MSJ Resp. Ex. 21)	A			

285	6/17/13 Griffith-Liguria email, J. Whitham to D. Portz, re: BHA/BHT (LIGURIA/GRIFF016680)	A			
286	[OMITTED]				
287	6/17/13, Griffith-Liguria emails and Griffith internal email, K. Holt – Griffith personnel – J. Whitham, D. Connor re: BHA/BHT (GLAB001133-1147; Shah Dep. Ex. 44)	A			
288*	<b>JOINT EXHIBIT NO. 41</b> (6/21/13 Griffith-Liguria email, C. Yuknis to J. Saulnier & J. Whitham re: labeling of restricted ingredients (GLAB001121-1122))				
289	6/25/13 Griffith-Liguria email, C. Yuknis to J. Saulnier & J. Whitham, re: updated Griffith specification for 017-2368 Optimized Plus Pepperoni Seasoning (LIGURIA/GRIFF 017222-17234)	A			
290	6/25/13 Liguria emails – J. Saulnier – J. Christopherson, re : disposal of product (LIGURIA/GRIFF 024701-24702)	A			
291	6/26/13 Griffith email, R. Barkowski – K. Holt re : pricing changes in 017-2368 (GLAB002155; Holt Dep. Ex. 82)	A			
292	7/1/13 Griffith-Liguria email, D. Connor to K. Holt, re: purchase of additional seasoning (LIGURIA/GRIFF016655-16657)	A			
293	7/9/13 Griffith internal email, D. Portz to Griffith personnel re: Executive Summary/Sensory Report of Liguria (GLAB001080-1082; Neill Dep. Ex. 40)	A			
294	7/11/13 Liguria email, J. Whitham to J. Peter Clark (LIGURIA/GRIFF 015910-15911)	A			
295	7/12/13 Griffith-Liguria emails, L. Windecker to D. Connor, re: Dry/Liquid Test Seasoning (Dual Pack) (LIGURIA/GRIFF025000-25002)	A			
296	7/12/13 J. Peter Clark Trip Report to Griffith (LIGURIA/GRIFF001426-1427)	A			
297	7/16/13 Griffith-Liguria emails, Griffith internal email S. Bergman – J. Whitham – Griffith personnel re: product information for Griffith 017-2368 (GLAB001074-1077; Shah Dep. Ex. 50)	A			
298	7/18/13 – 7/19/13 Griffith-Liguria emails, D. Connor – K. Holt, re: Optimized Plus Pepperoni Seasoning (Rosemary)	A			

	(LIGURIA/GRIFF024718-024719)				
299	7/26/13 Griffith Mixing Consistency Validation Study (GLAB 001067 – GLAB 001069; Shah Dep. Ex. 51; LIGURIA/GRIFF 002135-002137; Carson Dep. Ex. 13)	A			
300	7/26/13, 7/31/13 Griffith email, D. Portz to J. Whitham and J. Saulnier re: Griffith Mixing Consistency Validation Study (LIGURIA/GRIFF016681-16683)	A			
301	7/31/13 Griffith-Liguria email, J. Peter Clark – J. Whitham – D. Portz (LIGURIA/GRIFF001421-1424)	A			
302	<b>[OMITTED]</b>				
303	7/31/13 Griffith-Liguria email, D. Portz to Liguria personnel re: attached Mixing Validation Study (GLAB001067-1069; Portz Dep. Ex. 44)	A			
304	8/4/13 Griffith email, K. Holt – M. Nelsen, C. Woods, D. Portz, L. Windecker re: strategy for call w/Liguria (GLAB001051; Holt Dep. Ex. 86)	A			
305	8/6/13 Griffith-Liguria emails, L. Windecker – Liguria personnel re: testing of dry/liquid pepperoni seasoning (GLAB001977-1978)	A			
306	8/7/13 Griffith-Liguria email, K. Holt to Liguria to update re: 017-2368 (LIGURIA/GRIFF 017229-17730)	A			
307	8/16/13 Liguria email, P. Simkus to J. Saulnier re: product disposed, 5/2013-8/2013 (836,000 lbs; \$1.167M) (LIGURIA/GRIFF 024735-24736)	A			
308*	<b>JOINT EXHIBIT NO. 49</b> (10/10/13 Griffith, Liguria email D. Connor –K. Holt re: last purchase order w/Griffith, going w/another supplier (GLAB001039-1040; Holt Dep. Ex. 89))				
309*	<b>JOINT EXHIBIT NO. 42</b> (10/10/13 Griffith email re: Liguria’s moving of business to another supplier (GLAB001034; Holt Dep. Ex. 91))				
310	10/10/13, 11/4/13 Liguria emails, J. Whitham & K. Madsen, and Complaint Logs (2013, 2012, 2011, 2010, 2009, & 2008) (LIGURIA/GRIFF 019423-19574)	A			
311*	<b>JOINT EXHIBIT NO. 43</b> (10/30/13 Griffith-Liguria emails, J. Saulnier – C. Woods and				

	Griffith personnel re: meeting in Chicago on 11/20/13 (GLAB001024-1027)				
312	11/13/13 Liguria Internal Email from J. Saulnier to Liguria Personnel re: charts for mixing process (LIGURIA/GRIFF015460 – 15470; Saulnier Dep. Ex. 39)	A			
313*	<b>JOINT EXHIBIT NO. 44</b> (11/27/13 Liguria email, J. Saulnier to L. Chambers & Liguria team (various charts/data) (LIGURIA/GRIFF006014-6029; Saulnier Dep. Ex. 40))				
314	11/27/13 Liguria email, J. Saulnier to L. Chambers & Liguria personnel (LIGURIA/GRIFF 006014-6041)	A			
315	11/27/13 Liguria email, J. Saulnier to L. Chambers & Liguria team (various charts/data) (LIGURIA/GRIFF 006042-6069)	A			
316	11/30/13 Liguria email, J. Saulnier memorandum re: timeline (LIGURIA/GRIFF005981-5997)	A			
317	2/20/13 Griffith Certificate of Analysis of Optimized Pepperoni Seasoning 017-2112-00 (LIGURIA/GRIFF006904; Shah Dep. Ex. 12)	A			
318	5/09/13 Griffith Certificate of Analysis of Optimized Pepperoni Seasoning 017-2112-00 (LIGURIA/GRIFF014334; Shah Dep. Ex. 13)	A			
319	5/13/13 Griffith Certificate of Analysis of Optimized Plus Pepperoni Seasoning 017-2368-00 (LIGURIA/GRIFF014333; Shah Dep. Ex. 14)	A			
320	4/24/13; 5/15/13; and 5/28/13 ABC Research Test Data for Liguria (LIGURIA/GRIFF001391-1420)	A			
321	ABC Research Laboratories Analytical Results for Liguria (Feb. 2013 – Nov. 2013) (LIGURIA/GRIFF025042-025062)	B	FRE 801		
322	Griffith – Bacus Agreement (JBACUS0000042-43)	A			
323*	<b>JOINT EXHIBIT NO. 65</b> (J. Bacus Curriculum Vitae (pp. 490-491, Liguria MSJ Response; Bacus Dep. Ex. 1))				
324*	<b>JOINT EXHIBIT NO. 67</b> (J. Bacus Article: Antioxidants: Practical Technologies to Improve Food Safety; Meat Industry Research Conference, Oct. 1991)				

	(LIGURIA/GRIFF 015390-97; Bacus Dep. Ex. 2))				
325	Food Safety and Inspection Service, USDA (GLAB000279; Windecker Dep. Ex. 43)	A			
326	USDA Antioxidant Reg., 9 CFR Sec. 318.7 (GLAB001143; Bacus Dep. Ex. 3)	A			
327*	<b>JOINT EXHIBIT NO. 70</b> (3/11/13 Griffith memo; summary by K. Adams re: Griffith Pepperoni Seasoning 017-2112-00; 1/16/13 to 3/11/13(JBACUS000032-40; Bacus Dep. Ex. 7)				
328*	<b>JOINT EXHIBIT NO. 71</b> (3/14/13 Griffith PPT presentation: Liguria Pepperoni Situation Working Session (JBACUS000017-31; Bacus Dep. Ex. 10)				
329*	<b>JOINT EXHIBIT NO. 85</b> (3/21/13 Griffith Memorandum, K. Adams memo to J. Whitham (LIGURIA/GRIFF006913-6916; Bacus Dep. Ex. 11)				
330*	<b>JOINT EXHIBIT NO. 45</b> (3/20/13 Email from J. Bacus to J. Whitham (LIGURIA/GRIFF015060; Bacus Dep. Ex. 12))				
331	[OMITTED]				
332	[OMITTED]				
333	4/16/13 Griffith Memorandum, D. Portz to J. Saulnier (GLAB001247-1254; Bacus Dep. Ex. 15)	A			
334*	<b>JOINT EXHIBIT NO. 46</b> (4/23/13 Griffith Memorandum, D. Portz to J. Saulnier (JBACUS000010-16; Bacus Dep. Ex. 16))				
335	4/24/13, 4/22/13 Griffith email, L. Windecker – K. Holt – Griffith personnel re: left over booster bags (GLAB001239; Windecker Dep. Ex. 52)	A			
336*	<b>JOINT EXHIBIT NO. 72</b> (4/26/13 Griffith Memorandum, D. Portz to J. Saulnier (LIGURIA/GRIFF001472-1477; Bacus Dep. Ex. 17)				
337	4/30/13 Griffith Emails – Dr. Jim Bacus (GLAB001225-1227; Bacus Dep. Ex. 18)	A			
338	4/30/13 Email from J. Bacus to D. Portz and L. Windecker w/graphs (GLAB000235-236; Bacus Dep. Ex. 19)	A			
339	5/7/13 Emails from J. Bacus to Griffith and Liguria (GLAB001210-1211; Bacus Dep. Ex. 21; Portz Dep. Ex. 18)	A			
340	5/7/13 Griffith Letter, L. Windecker to D. Portz re: samples of pepperoni seasoning (GLAB000213-214; Bacus Dep. Ex. 22)	A			

341	5/7/13 Emails J. Bacus – J. Saulnier re: 1991 J. Bacus presentation (LIGURIA/GRIFF015389; LIGURIA/GRIFF021101-21126; Bacus Dep. Ex. 23)	A			
342	[OMITTED]				
343	[OMITTED]				
344	6/19/13 Emails Griffith – J. Bacus re: Bacus thoughts to Griffith’s proposed answers to Liguria (GLAB001125-1127, Bacus Dep. Ex. 29; Portz Dep. Ex. 36)	A			
345	7/19/13 Griffith-Liguria email, D. Portz – K. Holt, J. Saulnier re: report given to J. Whitham from 6/26/13 (GLAB001072-1073; Portz Dep. Ex. 42)	A			
346	8/2/13, 8/3/13, 8/4/13 Emails Griffith –Liguria – J. Bacus (LIGURIA/GRIFF015430-15431; Bacus Dep. Ex. 30)	A			
347*	<b>JOINT EXHIBIT NO. 73 &amp; JOINT EXHIBIT NO. 74</b> (Griffith Presentation re: Rancimat Technology (JBACUS000045-59; Bacus Dep. Exs. 31 and 32)				
348*	<b>JOINT EXHIBIT NO. 62</b> (Affidavit of John Hawthorne (LIGURIA/GRIFF026089-26091; Hawthorne Dep. Ex. 1))				
349	(June 2008 Sam’s Club Presentation (LIGURIA/GRIFF025679-025702; Hawthorne Dep. Ex. 2))	B	FRCP 26(e)(1)(A)		
350	(July 2009 Sam’s Club Presentation (LIGURIA/GRIFF025668-025677; Hawthorne Dep. Ex. 3))	B	FRCP 26(e)(1)(A)		
351	(April 2010 Sam’s Club Presentation (LIGURIA/GRIFF015344-015353; Hawthorne Dep. Ex. 4))	B	FRCP 26(e)(1)(A)		
352	(January 2011 Sam’s Club Presentation (LIGURIA/GRIFF025644-025655; Hawthorne Dep. Ex. 5))	B	FRCP 26(e)(1)(A)		
353	(5/11/13-5/13/13 John Hawthorne – Jehan Saulnier emails (LIGURIA/GRIFF025639-025640; Hawthorne Dep. Ex. 6))	B	FRCP 26(e)(1)(A)		
354	5/13 J. Hawthorne – J. Saulnier emails (LIGURIA/GRIFF025638-25640)	B	FRCP 26(e)(1)(A)		



355	4/29/13 Walmart – Sam’s Co-op Agreement, Defective Allowance \$2,570.85 (LIGURIA/GRIFF 001929-1930; Hawthorne Dep. Ex. 7)	A			
356	5/3/13 Wal-Mart – Sam’s Co-op Agreement, Defective Allowance \$23,651.82 (LIGURIA/GRIFF 001933-1936; Hawthorne Dep. Ex. 8)	A			
357	5/8/13 Wal-Mart – Sam’s Co-op Agreement, dated 5/08/2013, Defective Allowance \$23,994.60 (LIGURIA/GRIFF001937-1940; Hawthorne Dep. Ex. 9)	A			
358	5/13/13 Wal-Mart – Sam’s Co-op Agreement, Non PO Allowance Other: \$69,021.00 (LIGURIA/GRIFF001941-1949; Hawthorne Dep. Ex. 10)	A			
359	5/23/13 Wal-Mart – Sam’s Co-op Agreement, Non PO Allowance Other: \$152,194.32 (LIGURIA/GRIFF001950-1963; Hawthorne Dep. Ex. 11)	A			
360	12/4/13, Liguria – Sam’s Club email, Lance Chambers to Jeremy Gay (LIGURIA/GRIFF026562)	A			
361	12/4/13, Liguria email re: Sam’s Club, L. Chambers to Joe Henry (LIGURIA/GRIFF026563)	A			
362	1/23/14 – Sam’s Club & Liguria Foods - Meeting Agenda (LIGURIA/GRIFF026564)	A			
363	1/23/14 – Liguria Foods & Sam’s Club Meeting Presentation (LIGURIA/GRIFF026565-26569)	A			
364	1/27/14, Liguria – Sam’s Club email, Lance Chambers to John Hawthorne & Jeremy Gay (Sam’s Club) (LIGURIA/GRIFF026570)	A			
365	2/7/14, Liguria – Sam’s Club emails, L. Chambers & J. Hawthorne (LIGURIA/GRIFF026571-26572)	A			
366	3/10/14, Liguria-Sam’s Club email, L. Chambers to J. Hawthorne (LIGURIA/GRIFF026573)	A			
367	4/15/14 – Liguria Foods & Sam’s Club Meeting Presentation (LIGURIA/GRIFF026574-26577)	A			

368	4/24/14 – Sam’s Club – Liguria email, J. Hawthorne to L. Chambers (LIGURIA/GRIFF026578)	A			
369	4/24/14 – Sam’s Club & Liguria emails, J. Hawthorne & L. Chambers (LIGURIA/GRIFF026579-26580)	A			
370	4/25/14 – Sam’s Club & Liguria emails, J. Hawthorne & L. Chambers (LIGURIA/GRIFF026581-26583)	A			
371	5/5/14, 4/25/14 – Sam’s Club & Liguria emails, J. Hawthorne & L. Chambers (LIGURIA/GRIFF026584-26586)	A			
372	5/6/14, 5/5/14, 4/25/14 – Sam’s Club & Liguria emails, J. Hawthorne & L. Chambers (LIGURIA/GRIFF026587-26590)	A			
373	8/19/14, 8/20/14 – Liguria & Sam’s Club emails, L. Chambers & J. Hawthorne (LIGURIA/GRIFF026591-26592)	B	FRCP 26(e)(1)(A)		
374	Liguria Data re: Payments to Sam’s Club (6/13 & 9/13) (LIGURIA/GRIFF026598-26607)	A			
375	Liguria’s Complaint (filing date: 7/03/14)	A			
376	Griffith’s Amended Answer and Affirmative Defenses to Liguria’s Complaint (filing date: 12/10/14, Document 24)	A			
377	[OMITTED]				
378	[OMITTED]				
379	[OMITTED]				
380	Griffith’s Responses and Objections to Liguria’s Second Set of Interrogatories and Requests for Production of Documents, dated 8/31/15 (Shah Dep. Ex. 2)	A			
381	Griffith’s Supplemental Responses to Liguria’s First Set of Requests for Production of Documents dated 9/14/15 (MSJ Resp. Ex. 26)	A			
382	Griffith’s Supplemental Resp. to Liguria’s Interrogatory No. 5, dated 9/14/15 (MSJ Resp. Ex. 27)	A			
383	Griffith’s Amended Supplemental Resp. to Liguria’s Interrogatory No. 5, dated 9/25/15 (MSJ Resp. Ex. 28)	A			
384	Griffith’s Resp. & Obj. to Liguria’s Fourth (3 <sup>rd</sup> ) Set of Interrogs., dated 2/17/16 (MSJ Resp. Ex. 29; G. Neill Dep. Ex. 3; Portz Dep. Ex. 13)	A			

385	Griffith Resp. to Liguria's 3 <sup>rd</sup> Set of Req. for Prod'n. Of Docs (5/5/16)	A			
386	Griffith's Add'l Supplemental Resp. to Liguria's Interrog. No. 5, dated 8/31/16 (MSJ Resp. Ex. 30)	A			
387	Griffith's Response to Liguria's Fourth Request for Production of Documents (Request for Production Number 13) and Sixth Set of Interrogatories (Interrogatory Number 2), dated 11/29/16	A			
388	Affidavit of David Kim	A			
389	6/25/13 - 6/26/13 Visit Report from J. Peter Clark to Liguria (LIGURIA/GRIFF015225-15228; Milkowski Dep. Ex. 3)	A			
390	A. Milkowski Expert Report dated 7/14/16 (Milkowski Dep. Ex. 1; Carson Dep. Ex. 6; Sebranek Dep. Ex. 6)	A			
391	A. Milkowski Rebuttal Expert Report to J. Sebranek, dated 12.28.2016	A			
392	A. Milkowski Rebuttal Expert Report to J. Carson, dated 12.28.2016	A			
393	A. Milkowski Curriculum Vitae and List of Publications	A			
394	Rebuttal Report of Milkowski's - Discussion of the "Declaration of Dr. Kevin Keener in Support of Griffith Laboratories, Inc." dated April 24, 2017	A			
395	6/13/14 Liguria internal email, D. Iverson – J. Christopherson re: Complaint Analysis & attachment (LIGURIA/GRIFF024648-24652)	A			
396*	<b>JOINT EXHIBIT NO. 53</b> (4/9/13 Griffith-Liguria email, K. Adams – J. Whitham , D. Portz re: Liguria Traceability Charting & attachments (LIGURIA/GRIFF006935-6953))				
397	Griffith memo re: 1/16/13 Liguria Pepperoni color not holding shelf life of product (GLAB000521-525)	A			
398	Kemin Technical Literature (2010) (LIGURIA/GRIFF004471-4477)	A			
399	3/13/13 ABC Research Laboratories Analytical Results to Liguria (LIGURIA/GRIFF015321-15324)	A			
400	Nealanders Antioxidant G-30 Technical Information Sheet (GLAB000038)	A			

401	5/1/12 Griffith Sales order Packing List (LIGURIA/GRIFF000429)	A			
402	Griffith analytical testing data results (GLAB000460-464)	A			
403*	<b>JOINT EXHIBIT NO. 86</b> (7/16/13, 7/12/13 Liguria email, J. Bacus – J. Christopherson re: testing of conversion of dry spices to liquids (LIGURIA/GRIFF004448-4450))				
404	7/16/13 Liguria email, J. Bacus – J. Christopherson, J. Whitham re: Trilogy liquid and more testing (LIGURIA/GRIFF 004456-4457)	A			
405*	<b>JOINT EXHIBIT NO. 54</b> (3/28/13 Liguria internal email re: Newlyweds Foods using liquid versions of BHT/BHA (LIGURIA/GRIFF002215-2218))				
406	4/10/13 ABC Research Laboratories Analytical Results to Liguria (LIGURIA/GRIFF002453-2458)	A			
407	6/25/13 Griffith-Liguria email, C. Yuknis – Liguria personnel re: updated product specification for Optimized Plus Pepperoni Seasoning & attachment (GLAB001118-1120)	A			
408	6/18/13, 6/17/13, Griffith-Liguria emails re: BHA/BHT levels, GLAB 000583-588	A			
409	<b>[OMITTED]</b>				
410A	Liguria Documents re: Oxidation Issues (LIGURIA/GRIFF006072-6085)	A			
410B	Analysis of Griffith Process Variations – February – August 2013 (LIGURIA/GRIFF006079)	A			
411	Griffith CoA's for Optimized Pepperoni Spice, January-August 2013 (LIGURIA/GRIFF006086-6097)	A			
412	7/31/13 Griffith-Liguria email, J. Saulnier – D. Portz, J. Whitham and Griffith personnel re: Mixing Validation Study; J. Peter Clark email to J. Whitham re: Mixing Validation Study, (LIGURIA/GRIFF002141-2143)	A			
413	3/19/13 Report from Griffith, marked GLAB000505-506	A			
414	<b>[OMITTED]</b>				
415	4/1/13 Griffith-Liguria emails, D. Connor – D. O'Keefe re: PO#120551 (LIGURIA/GRIFF 006920-6921)	A			

416	4/15/13 Griffith internal email re: level of carnosic acid in Antioxidant Booster (GLAB002134; Windecker Dep. Ex. 44)	A			
417	4/15/13 Griffith Temporary Specification Confidential for Optimized Pepperoni Seasoning (LIGURIA/GRIFF 005637-5638)	A			
418	5/7/13 Formula Version Printouts (GLAB000319-321)	A			
419	3/2/10 Griffith-Liguria email, K. Holt to Griffith personnel re: using 017-2043, previously 967-7705 (GLAB002537-2538)	A			
420	[OMITTED]				
421	03/02/10 Email from D. Connor to J. Whitham, K. Holt and G. Pearson re: Lot #72853 color too pale and product returned (GLAB003031)	A			
422	3/11/10 Griffith-Liguria Email re: returned lot 75853 for being too pale (GLAB003026-3027)	A			
423	12/10/09 Griffith Emails re: issues w/Italian Salami Spice 0170975 and switching anti-caking (GLAB002724-2731)	A			
424	12/10/09 Griffith Emails re: issues w/Italian Salami Spice 0170975 and switching anti-caking (GLAB002732-2736)	A			
425	12/05/13 Griffith internal email re: Liguria formulas and details of relationship (GLAB001017-1018)	A			
426	8/5/13 Griffith-Liguria email re: sensory testing of alternate raw material and rancimat test results (GLAB001047-1048)	A			
427	[OMITTED]				
428*	<b>JOINT EXHIBIT NO. 48</b> (Customer Complaint Spreadsheet (GLAB001271-1276))				
429*	<b>JOINT EXHIBIT NO. 55</b> (2012 Liguria Raw Material Data Listing (LIGURIA/GRIFF001644-1675))				
430	J. H. Mahon and R. A. Chapman, 1953, <i>The Relative Rates of Destruction of Propyl Gallate and Butylated Hydroxyanisole in Oxidizing Lard</i> , Journal of the American Oil Chemist's Society Vol 30, pp 32-39 (A. Milkowski)	A			
431	US Patent 3,095,306 (A. Milkowski)	A			

432	US Patent 5,059,437 (A. Milkowski)	A			
433	US Patent 5,314,686 (A. Milkowski)	A			
434	<a href="http://www.kalsec.com/products/colors/specialty-products/durabrite/">http://www.kalsec.com/products/colors/specialty-products/durabrite/</a> accessed April 26, 2016 (A. Milkowski)	A			
435	9 CFR § 424.21 (A. Milkowski)	A			
436	21 CFR §§ 172.105 – 172.190 (A. Milkowski)	A			
437	B. M. Watts, 1954, <i>Oxidative Rancidity and Discoloration in Meat</i> , Advances in Food Research, Vol 5, pp. 25-27, Academic Press (A. Milkowski)	A			
438	E. R. Sherwin, 1978, <i>Oxidation and Antioxidants in Fat and Oil Processing</i> , Journal of the American Oil Chemist's Society Vol 55, p. 814 (A. Milkowski)	A			
439	Journal of Food Science 1999 Volume 64: 69-74 (A. Milkowski)	A			
440	9 CFR § 317.309 (A. Milkowski)	A			
441	<i>Journal of Animal Science, Effects of Corn Distillers Dried Grains with Solubles on Quality Traits of Pork</i> , McClelland, K.M., et al., J. Anim. Sci. 90: 4148-4159 (2012) (A. Milkowski)	A			
442	<i>Journal of Animal Science, Growth Performance and Pork Fat Quality as Measured by Three Methods of Pigs Fed 20% DDGS and Slaughtered Using a Standard Industry Split Marketing Strategy</i> , Shircliff, K.E., et al., J. Anim. Sci. 93: 5083-5090 (2015) (A. Milkowski)	A			
443	US Grains Council, A GUIDE TO Distiller's Dried Grains with Solubles (DDGS), 3 <sup>rd</sup> edition October 2012, <a href="http://www.grains.org/buyingselling/ddgs/ddgs-user-handbook">http://www.grains.org/buyingselling/ddgs/ddgs-user-handbook</a> , Accessed 6/8/2016 (A. Milkowski), p.241-251	A			
444	[OMITTED]				
445	U.S. Patent 2,845,358, <i>Method of Preserving Fresh Frozen Pork Trimmings</i> (1958) (A. Milkowski) (LIGURIA/GRIFF025066-25067)	A			
446	[OMITTED]				
447	[OMITTED]				

448	[OMITTED]				
449	[OMITTED]				
450	US Patent 2,704,746 (A. Milkowski)	A			
451	U.S. Patent 2,901,354, <i>Method of Protecting Dry Sausage Against Discoloration and Rancidity</i> (Patented August 25, 1959) (A. Milkowski)	A			
452	U.S. Patent 3,366,495, <i>Method of Preserving Fresh Frozen Pork Sausage</i> (1968) (A. Milkowski)	A			
453	U.S. Patent 3,502,484, <i>Antioxidant Salt</i> (1970) (A. Milkowski)	A			
454*	<b>JOINT EXHIBIT NO. 47</b> (2/11/13 Liguria email from J. Saulnier re: testing XF beefs for rancidity (LIGURIA/GRIFF018843-18853))				
455	[OMITTED]				
456	[OMITTED]				
457	Sebranek, J. G., Sewalt, V.J.H., Robbins, K.L., and Houser, T. A. 2005. <u>Comparison of a natural rosemary extract and BHA/BHT for relative antioxidant effectiveness in pork sausage</u> . Meat Science 69:289–296 (A. Milkowski; Sebranek Dep. Ex. 5)	A			
458	[OMITTED]				
459	[OMITTED]				
460	[OMITTED]				
461*	<b>JOINT EXHIBIT NO. 56</b> ( 12/1/11 Liguria email, J. Saulnier – P. Simkus re: Brand Tiers & attached product tiers (LIGURIA/GRIFF017132-17133))				
462	Inventory Items 9/1/11 – 9/1/12 (GLAB001545)	A			
463*	<b>JOINT EXHIBIT NO. 57</b> (Confidential Comparative Customer Complaint Summary Report for Production periods 2012 to 2013 (LIGURIA/GRIFF0017112-17115))				
464	7/27/13, 10/1/13 Liguria Firehouse Subs Packaging Quality Issue Letters from J. Christopherson (LIGURIA/GRIFF026593-26597)	A			



465	[OMITTED]				
466	[OMITTED]				
467	[OMITTED]				
468	[OMITTED]				
469	[OMITTED]				
470	[OMITTED]				
471	[OMITTED]				
472	[OMITTED]				
473	[OMITTED]				
474	[OMITTED]				
475	[OMITTED]				
476	[OMITTED]				
477	5/14/13 Formula Version Printout for ASC Premix for Rancimat Test (GLAB000185)	A			
478	[OMITTED]				
479	Liguria Internal Control Procedures Manual (LIGURIA/GRIFF003969-4080)	A			
480	Details re: meeting to J. Bacus at Griffith (JBACUS000044)	A			
481	Liguria Reformulations Folder (GLAB000118-176)	A			
482	7/15/12 Griffith Formula Version Printout for Optimized Pepperoni Seasoning (GLAB000017-18)	A			
483*	<b>JOINT EXHIBIT NO. 58</b> (Liguria Internal Control Procedures (LIGURIA/GRIFF004024-4025))				
484	D. Dickey Expert Report, dated 7/14/16	A			
485	D. Dickey Supplemental Expert Report, dated 11/2/16	A			
486	D. Dickey Rebuttal Expert Report to Dr. John W. Carson, dated 12/28/16	A			
487	D. Dickey Curriculum Vitae and List of Publications	A			
488	[OMITTED]				
489	[OMITTED]				
490	[OMITTED]				
491	[OMITTED]				
492	[OMITTED]				
493	[OMITTED]				
494	[OMITTED]				
495	[OMITTED]				

496	Cox, Brian D., "Optimize Your Solids Blender," CEP (Chemical Engineering Progress), pp 77-80, October (2000) (D. Dickey)	A			
497	[OMITTED]				
498	[OMITTED]				
499	[OMITTED]				
500	[OMITTED]				
501	Dudley, Lee, "Choosing a Blender Based on Your Material's Flow Properties," Powder and Bulk Engineering, January, pp. 37-39, (2001) (Carson Dep. Ex. 17) (D. Dickey)	A			
502	[OMITTED]				
503	[OMITTED]				
504	[OMITTED]				
505	[OMITTED]				
506	Holman, Peter R., "How to Achieve Uniform Mixtures with Master Batching." Powder and Bulk Engineering, January, pp 75-81 (2008) (D. Dickey) (Dickey Dep. Ex. 8)	A			
507	[OMITTED]				
508	[OMITTED]				
509	[OMITTED]				
510	Kaye, Brian H., "Answers to Some Common Mixing Questions," Powder and Bulk Engineering, January, pp 25-31, (2002) (D. Dickey)	A			
511	Manjunath, K., S. Dhodapkar, and K. Jacob. Chapter 15, Part B: Mixing of Particulate Solids in the Process Industries, Handbook of Industrial Mixing, Science and Practice, edited by E. L. Paul, V. A. Atiemo-Obeng, and S. M. Kresta. (2004) (D. Dickey)	A			
512	[OMITTED]				
513	Merrow, Edward W., "A Quantitative Assessment of R&D Requirements for Solids Processing Technology, Rand Corporation, July (1986) (D. Dickey)	A			
514	[OMITTED]				
515	[OMITTED]				
516	[OMITTED]				
517	[OMITTED]				
518	[OMITTED]				
519	[OMITTED]				
520	[OMITTED]				

521	11/10/00 Griffith letter to J. McCloskey from J. Randall re: formula and specifications for Pepperoni Seasoning 017-0975 and specifications (LIGURIA/GRIFF026334-LIGURIA/GRIFF026490)	A			
522	Expert Report of John W. Carson, Ph.D, dated 11.29.16 (Carson Dep. Ex. 2; Sebranek Dep. Ex. 22)	A			
523	Expert Report of David S. Dickey, Ph.D, dated 07.14.16 (Carson Dep. Ex. 4)	A			
524	David S. Dickey, Ph.D Supplemental Expert Report, dated 11.02.16 (Carson Dep. Ex. 5)	A			
525	<b>[OMITTED]</b>				
526*	<b>JOINT EXHIBIT NO. 59</b> (4/4/13 Internal Griffith Email (GLAB001280-1282; Carson Dep. Ex. 9; Sebranek Dep. Ex. 17; Portz Dep. Ex. 7; Shah Dep. Ex. 37))				
527	Solids Mixing Figure (Carson Dep. Ex. 11)	A			
528	6/21/13 Product 017-2112 Optimized Pepperoni Seasoning - R&D Formula Explosion (GLAB000032-33; Carson Dep. Ex. 12; Sebranek Dep. Ex. 4; Windecker Dep. Ex. 3)	A			
529	8/31/16, 9/30/16, 10/31/16, 11/30/16 Invoices for Professional Services of John W. Carson, Ph.D to Perkins Coie from Jenike & Johanson (Carson Dep. Ex. 21)	A			
530	<b>[OMITTED]</b>				
531	<b>[OMITTED]</b>				
532	<b>[OMITTED]</b>				
533	USDA Food Standards and Labeling Policy Book (Sebranek Dep. Ex. 2)	A			
534	3/1/13 Liguria email, J. Whitham and Prof. Jim Dickson, ISU (LIGURIA/GRIFF001446-1447; Sebranek Dep. Ex. 7)	A			
534B	<b>[OMITTED]</b>				
535	1/28/13 Liguria Product & Customer Complaint Form w/photographs (LIGURIA/GRIFF000645-648; Sebranek Dep. Ex. 11)	A			
536	Expert Report of Joseph G. Sebranek, Ph.D, dated 11.29.16	A			

	(Sebranek Dep. Ex. 12; Carson Dep. Ex. 3)				
537*	<b>JOINT EXHIBIT NO. 57</b> (Comparative Analysis Customer Complaint Summary Report for Production Periods 2012 and 2013 (LIGURIA/GRIFF017112-17115; Sebranek Dep. Ex. 16; Milkowski Dep. Ex. 2))				
538	(J. Sebranek Curriculum Vitae) (Sebranek Dep. Ex. 21))	A			
539	Expert Report of David J. Harkavy, CPA, CFF, dated July 15, 2016 (Burns Dep. Ex. 4)	A			
540	Rebuttal Report of David J. Harkavy, CPA, CFF to the Expert Report of Francis X. Burns, dated 09.29.16	A			
541	Supplemental Expert Report of David J. Harkavy, CPA, CFF, dated 01.06.17	A			
542	D. Harkavy Curriculum Vitae	A			
543*	<b>JOINT EXHIBIT NO. 82</b> Confidential Information Presentation (“the BlackArch Presentation”) for the potential sale of Liguria (LIGURIA/GRIFF025563-25635)				
544	2012 and 2013 Liguria Complaint Log (LIGURIA/GRIFF001676 – 001681)	A			
545*	<b>JOINT EXHIBIT NO. 61</b> (Liguria Business Review Presentation to Sam's Club. April 26, 2010 (LIGURIA/GRIFF015344-15353))				
546	Liguria Business Review Presentation to Sam's Club. February 2, 2012 (LIGURIA/GRIFF026054-26064)	A			
547*	<b>JOINT EXHIBIT NO. 62</b> (Executed Affidavit of John R. Hawthorne (LIGURIA/GRIFF026089-26091))				
548	Emails between J. Hawthorne and J. Saulnier (LIGURIA/GRIFF025638-25640)	B	FRCP 26(e)(1)(A)		
549	American Institute of Certified Public Accountants (“AICPA”) - Business Valuation and Forensic & Litigation Services Section – “Calculating Lost Profits” by Pollack, Bouchner, Enos, Johns and Moyl – 2006, New York NY );	A			
550	Roma/PFG Tempe Additional Rebate of \$.073/lb letter (LIGURIA/GRIFF026167)	B	FRCP 26(e)(1)(A)		
551	Sam's Club FYE 2008-2015 Reported Sales (LIGURIA/GRIFF026198-26199)	B	FRCP 26(e)(1)(A)		
552	Various Customer Sales Information from FY2010 -FY2016 (LIGURIA/GRIFF026025-26052)	B	FRCP 26(e)(1)(A)		

553	Pontrelli FYE 2010 - 2016 Reported Sales (LIGURIA/GRIFF026184-26197)	B	FRCP 26(e)(1)(A)		
554	Pontrelli FYE 2009-2015 Reported Sales (LIGURIA/GRIFF026215)	B	FRCP 26(e)(1)(A)		
555	By George FYE 2010 - 2016 Reported Sales (LIGURIA/GRIFF026170-26183)	B	FRCP 26(e)(1)(A)		
556	By George FYE 2009 - 2015 Reported Sales (LIGURIA/GRIFF026214)	B	FRCP 26(e)(1)(A)		
557	FY 2013 - 2016 Expense Accounts (LIGURIA/GRIFF026225-26229)	B	FRCP 26(e)(1)(A)		
558	Liguria Presentation to Houlihan Lokey Consumer & Food Conference, February 2013 (LIGURIA/GRIFF025798-25814)	B	FRCP 26(e)(1)(A)		
559	Sam's Club Credit Memos Issued Due to Discoloration (LIGURIA/GRIFF001929-1963)	A			
560	Other Customers At-Issue Credit Memos Issued Due to Discoloration (LIGURIA/GRIFF026097)	B	FRCP 26(e)(1)(A)		
561	Other Customers Invoices and Credit Memos Supporting Documentation (LIGURIA/GRIFF000001-366)	A			
562	Liguria Customer Sales By Month FY 2015-2016 (LIGURIA/GRIFF025368-25500)	A			
563	Liguria Presentation for Sam's Club Meeting, January 23, 2014 (LIGURIA/GRIFF026565-26569)	B	FRCP 26(e)(1)(A)		
564	Liguria Presentation for Sam's Club Meeting, April 15, 2014 (LIGURIA/GRIFF026574 – 026577)	B	FRCP 26(e)(1)(A)		
565	SUM – 100 and UPDATED SUM-100 (Damages Summary )	A			
566	[OMITTED]				
567	Liguria Operating Expenses (LIGURIA/GRIFF025628)	B	FRCP 26(e)(1)(A)		
568	Liguria Financial Statements; EV/EBITDA Multiples/EV EBITDA (LIGURIA/GRIFF025561)	B	FRCP 26(e)(1)(A)		
569	Liguria Discounted Cash Flow (LIGURIA/GRIFF025637)	B	FRCP 26(e)(1)(A)		
570	SUM - 120 ( Estimated 2015 Normalized Lost Profits Attributable To Customers Lost (Not Returned)	A			
571	SUM - 130 and UPDATED SUM-130 (Lost Profits Summary )	A			
572	SUM – 200 and UPDATED SUM-200	A			

	(Estimated Lost Profits - Summary )				
573	SUM - 205 and UPDATED SUM-205 (Estimated Historical Lost Profits )	A			
574	SUM – 210 and UPDATED SUM-210 (Estimated Future Lost Profits )	A			
575	SUM – 220 and UPDATED SUM-220 (Sam's Club Estimated Historical Lost Profits )	A			
576	SUM - 225 and UPDATED SUM-225 (Contribution Margin - Regular Pepperoni for Sam's Club )	A			
577	SUM – 230 and UPDATED SUM-230 (Other Customers Estimated Historical Lost Profits - Regular Pepperoni )	A			
578	SUM – 235 and UPDATED SUM-235 (Estimated Lost Pounds for Other Customers - Regular Pepperoni)	A			
579	SUM - 240 and UPDATED SUM-240 (Regular Pepperoni Contribution Margin )	A			
580	Product Line Sales By Month 3-12 through 2-14 (LIGURIA/GRIFF025508-25524)	B	FRCP 26(e)(1)(A)		
581	SUM – 250 and UPDATED SUM-250 (Other Lost Customers Estimated Historical Lost Profits - Other Products )	A			
582	SUM - 255 and UPDATED SUM-255 (Estimated Lost Pounds for Other Customers - Other Products)	A			
583	SUM - 260 and UPDATED SUM-260 (Contribution Margin - Other Products )	A			
584	SUM - 270 and UPDATED SUM-270 (Regular Pepperoni Net Sales Price Comparison - Sam's Club )	A			
585	Liguria Price Quote Options 2008/2009 LIGURIA/GRIFF 025692	B	FRCP 26(e)(1)(A)		
586	SUM - 275 and UPDATED SUM-275 (Regular Pepperoni Net Sales Price Comparison - Roma Durham / IFH )	A			
587	Liguria New Local Marketing Agreement June 2013 (LIGURIA/GRIFF026166-26167)	B	FRCP 26(e)(1)(A)		
588	[OMITTED]				
589	[OMITTED]				
590	SUM - 290 and UPDATED SUM-290 (Production and Sales Volume for FY 2011 – 2016)	A			
591	SUM - 295 and UPDATED SUM-295 (Liguria Discount Rate and Discount Factors )	A			

592	SUM - 298 and UPDATED SUM-298 (Incremental Expense Analysis )	A			
593	LIGURIA/GRIFF 026224-26229	B	FRCP 26(e)(1)(A)		
594	SUM – 310 and UPDATED SUM-310 (Sam's Club's Calculated Growth And Estimated Lost Pounds )	A			
595	SUM - 312 (Sam's Club's Regular Pepperoni Sales Information from March 2008 to February 2014 )	A			
596	SUM - 314 (Sam's Club Sales (in LBS) from March 2008 to April 2013 )	A			
597	SUM - 320 (Roma Durham / IFH Calculated Growth And Estimated Lost Pounds - Regular Pepperoni )	A			
598	SUM - 322 (Roma Durham / IFH Regular Pepperoni Sales Information from March 2009 to February 2016 )	A			
599	SUM - 324 (Roma Durham / IFH Calculated Growth And Estimated Lost Pounds - Other Products )	A			
600	SUM - 326 (Roma Durham / IFH Sales Information from March 2009 to February 2016 - Other Products)	A			
601	SUM - 328 (Roma Durham / IFH Sales (in LBS) from March 2010 to February 2016 - Regular Pepperoni )	A			
602	SUM - 330 (PFG Milton's Calculated Growth And Estimated Lost Pounds - Regular Pepperoni )	A			
603	SUM - 332 (PFG Milton's Regular Pepperoni Sales Information from March 2009 to February 2016 )	A			
604	SUM - 334 (PFG Milton's Calculated Growth And Estimated Lost Pounds - Other Products )	A			
605	SUM - 336 (PFG Milton's Sales Information from March 2009 to February 2016 - Other Products )	A			
606	SUM - 338 (PFG Milton's Sales (in LBS) from March 2010 to February 2016 - Regular Pepperoni)	A			
607	SUM - 340 ( Fox's Pizza Distribution Calculated Growth And Estimated Lost Pounds - Regular Pepperoni )	A			
608	SUM - 342 ( Fox's Pizza Distribution (Corp) Regular Pepperoni Sales Information from March 2010 to February 2014 )	A			



609	SUM - 344 ( Fox's Pizza Distribution Calculated Growth And Estimated Lost Pounds - Other Products )	A			
610	SUM - 346 ( Fox's Pizza Distribution (Corp) Information from March 2010 to February 2014 - Other Products )	A			
611	SUM - 348 ( Fox's Pizza Distribution (Corp) Sales (in LBS) from October 2010 to December 2012 - Regular Pepperoni )	A			
612	SUM - 350 ( Pontrelli & Laricchia, LTD Calculated Growth )	A			
613	SUM - 352 ( Pontrelli & Laricchia, LTD Sales Information from March 2008 to February 2014 )	A			
614	SUM - 354 ( Chart of Total Pounds Sold to Pontrelli & Laricchia, LTD from February 2009 to June 2013)	A			
615	SUM - 360 ( By George Calculated Growth and Lost Pounds )	A			
616	SUM - 362 (By George Food Sales Information from March 2008 to February 2014 )	A			
617	SUM - 364 (Chart of Total Pounds Sold to By George Food from March 2008 to August 2013 )	A			
618	[OMITTED]				
619	SUM - 405 and UPDATED SUM-405 (Additional Rebates - PFG / Roma Sales By Pounds (Private Label) FY 2018 – 2020)	A			
620	[OMITTED]				
621	[OMITTED]				
622	[OMITTED]				
623	[OMITTED]				
624	[OMITTED]				
625	Liguria PFG/Roma Sales by Pound (LIGURIA/GRIFF026223)	B	FRCP 26(e)(1)(A)		
626	SUM - 425 and UPDATED SUM-425 (PFG / Roma Sales By Pounds (Private Label) FY 2017 )	A			
627	SUM - 426 and UPDATED SUM- 426 (PFG / Roma Rebate Information (Private Label)	A			
628	SUM - 430 and UPDATED SUM-430 (Liguria Credit Memos )	A			
629	SUM – 435 and UPDATED SUM-435 (Sam's Club Posted Sales Credit Memos)	A			
630	Posted Sales Credit Memos (LIGURIA/GRIFF001611-1612)	A			
631	Posted Sales Credit Memos (LIGURIA/GRIFF001970)	A			

632	SUM - 440 and UPDATED SUM-440 (Other Customers Posted Sales Credit Memos )	A			
633	Credit Memos (LIGURIA/GRIFF 026536-26561)	B	FRCP 26(e)(1)(A)		
634	Other CR Memos (LIGURIA/GRIFF 026096-26097)	B	FRCP 26(e)(1)(A)		
635	Liguria Foods, Inc. Shortage Memos (LIGURIA/GRIFF 001510-1518)	A			
636	SUM – 450 and UPDATED SUM-450 (Liguria Customer Sales from March 2012 to February 2013 )	A			
637	03.A-B-Customer Sales By Month 3-12 through 2-14 (LIGURIA/GRIFF 025304-25367)	B	FRCP 26(e)(1)(A)		
638	SUM - 500 (Liguria Profit and Loss Statements FY 2012 )	A			
639	Liguria Foods, Inc. Rolling P&L, Mar-11-Feb-12 (LIGURIA/GRIFF 025076-25077)	B	FRCP 26(e)(1)(A)		
640	SUM - 505 (Liguria Profit and Loss Statements FY 2013 )	A			
641	Liguria Foods, Inc. Rolling P&L, Mar-12-Feb-13 (LIGURIA/GRIFF 025078-25079)	B	FRCP 26(e)(1)(A)		
642	SUM - 510 (Liguria Profit and Loss Statements FY 2014 )	A			
643	Liguria Foods, Inc. Rolling P&L, Mar-13-Feb-14 (LIGURIA/GRIFF 025080-25081)	B	FRCP 26(e)(1)(A)		
644	SUM - 515 (Liguria Profit and Loss Statements FY 2015 )	A			
645	Liguria Foods, Inc. Rolling P&L, Mar-14-Feb-15 (LIGURIA/GRIFF 025082-025083)	A			
646	SUM - 520 (Liguria Profit and Loss Statements FY 2016 )	A			
647	Liguria Foods, Inc. Rolling P&L, Period ended February 27, 2016 (Period 12 of 12) (LIGURIA/GRIFF025281)	B	FRCP 26(e)(1)(A)		
648	SUM - 525 and UPDATED SUM-525 ( Liguria Profit and Loss Statements FY 2017 )	A			
649	SUM-600 (Analysis of Fiscal Year 2016 Sales Volume Increase)	A			
650	<b>[OMITTED]</b>				
651	SUM - 600 (a) ( USDA Pork Trimmings Monthly Historical Prices )	A			
652	SUM - 600 (b) ( Analysis of Fiscal Year 2016 Sales Volume Increase )	A			
653	SUM - 605 ( Liguria Sales Volume for FY 2009 - 2016 )	A			

654	[OMITTED]				
655	Liguria's Industry-Leading Financial Profile (LIGURIA/GRIFF025575; Burns Dep. Ex. 7)	B	FRCP 26(e)(1)(A)		
656	Liguria's Commitment to Operational Excellence (LIGURIA/GRIFF025600; Burns Dep. Ex. 8)	B	FRCP 26(e)(1)(A)		
657	Duff & Phelps 2016 Valuation Handbook (Burns Dep. Ex. 9)	A			
658	8/1/16 Letter to Christopher B. Wilson, Esq. from Global Economics Group, LLC re: Francis X. Burns' expert services (Burns Dep. Ex. 10)	A			
659	9/19/16 Invoice No. 3804, \$57,495.00 for Professional Services of Francis X. Burns to Perkins Coie from Global Economics Group (Burns Dep. Ex. 11)	A			
660	Expert Report of Francis X. Burns, dated 9/6/16	A			
661	USDA Pork Trimmings 72% Lean Price Per Pound Monthly Historical Prices ( <a href="http://www.ers.usda.gov/data-products/livestock-meat-domestic-data.aspx#26178">http://www.ers.usda.gov/data-products/livestock-meat-domestic-data.aspx#26178</a> )	A			
662	[OMITTED]				
663	[OMITTED]				
664	2/4/17 Statement of Joseph G. Sebranek, Ph.D.	A			
665	2/6/17 Supplemental Opinion Expert Report of Andrew L. Milkowski, Ph.D.	A			
666	Liguria Daily Production Sheets (5/17, 5/18, 5/21, 5/22, 5/24, 5/25, 5/29, 5/31/2012) (LIGURIA/GRIFF 017376; 017383; 017404; 017411; 017425; 017432; 017439; 017446; 017453)	A			
667	Liguria Daily Production Sheets (6/2, 6/4, 6/5, 6/6, 6/7, 6/8, 6/9, 6/11, 6/12, 6/13, 6/14, 6/15, 6/16, 6/18, 6/19, 6/20, 6/21, 6/22, 6/23, 6/25, 6/26, 6/27, 6/28, 6/29, 6/30/2012) (LIGURIA/GRIFF 017467; 017474; 017481; 017488; 017495; 017502; 017509; 017516; 017523; 017530; 017537; 017544; 017551; 017558; 017565; 017572; 017579; 017586; 017600; 017593; 017607; 017614; 017621; 017642; 017648; 018140; 017635; 017697)	A			
668	Liguria Daily Production Sheets (7/2, 7/3, 7/5, 7/6, 7/7, 7/9, 7/10, 7/11, 7/12, 7/13, 7/16, 7/17, 7/18, 7/19, 7/21, 7/23, 7/24, 7/25, 7/26, 7/27, 7/28, 7/30, 7/31/2012) (LIGURIA/GRIFF 017690; 017705; 017712; 017726; 017733; 018145; 017747; 017754; 018152; 018166; 018173; 018180;	A			

	018187; 018208; 018215; 018222; 018229; 018243; 018250; 018257; 018264; 018271; 018278; 018285; 018292; 018299; 018306; 018313; 018320; 018327; 018334)				
669	Liguria Daily Production Sheets (8/1, 8/2, 8/3, 8/4, 8/6, 8/7, 8/8, 8/9, 8/10, 8/11, 8/13, 8/14, 8/23, 8/27, 8/28, 8/29/, 8/30/2012) (LIGURIA/GRIFF 018341; 018355; 018366; 018373; 018380; 018387; 018394; 018401; 018408; 018415; 018422; 018429; 018443; 018450; 018457; 018464; 018471; 018478; 018485; 018492; 018499; 018506; 018513; 018520; 018527)	A			
670	Liguria Daily Production Sheets (9/1, 9/7, 9/8, 9/10, 9/11, 9/13, 9/26, 9/27/2012) (LIGURIA/GRIFF 018534; 018541; 018543; 018548; 018550; 018562; 018569; 018436; 018576; 018583)	A			
671	Liguria Daily Production Sheets (10/9/2012; LIGURIA/GRIFF 018590)	A			
672	Liguria Daily Production Sheets (11/9, 11/12/2012) (LIGURIA/GRIFF 018597; 018604)	A			
673	Liguria Daily Production Sheets (12/14, 12/20, 12/29, and 12/31/2012) (LIGURIA/GRIFF 018611; 018625; 018639)	A			
674	<b>[OMITTED]</b>				
675*	<b>JOINT EXHIBIT NO. 83</b> Liguria Foods, Inc. – Internal Control Procedures – Rework Control (2/28/2011) (LIGURIA/GRIFF026839)				
676*	<b>JOINT EXHIBIT NO. 84</b> Liguria Foods, Inc. – Internal Control Procedures – Rework Control (11/19/2012) LIGURIA/GRIFF026838)				
677*	<b>JOINT EXHIBIT NO. 76</b> Liguria Foods, Inc. – Internal Control Procedures – Rework Control (2/1/2013) LIGURIA/GRIFF004051-4052)				
678A	<b>[OMITTED]</b>				
678	NSF International – Food Safety, Quality and Food Defense Audit, July 2012 (LIGURIA/GRIFF024757-24766)	A			
679	SQF Audit, December 2013 (LIGURIA/GRIFF025888-25951)	A			
680	Liguria Foods, Inc. – Formula No. 19319 (effective 03/13/08) (SEAVEY000028-29)	A			
681	Liguria Dry Room Days By Product (LIGURIA/GRIFF026704-26722)	A			

682*	<b>JOINT EXHIBIT NO. 64</b> (Liguria Operational Excellence 2012 DRAFT Output, July 10-12, 2012 (LIGURIA/GRIFF026723-26785))				
683	Liguria Internal Control Policy (02/01/2013) (LIGURIA/GRIFF002461-2592)	A			
684	Standard Sanitation Operating Procedures for Liguria Foods, Inc. (01/24/2013) (LIGURIA/GRIFF002648-2657)	A			
685	5/23/13 Email from K. Holt of Griffith to J. Saulnier of Liguria, re: two-part pepperoni seasoning system (LIGURIA/GRIFF 002437 – 002438)	A			
686	<b>[OMITTED]</b>				
687*	<b>JOINT EXHIBIT NO. 20</b> (3/11/13 Griffith-Liguria Email from K. Adams re: Fatty Acid Profile results (GLAB 001366-1379))				
688	<b>[OMITTED]</b>				
689	<b>[OMITTED]</b>				
690	<b>[OMITTED]</b>				
691	<b>[OMITTED]</b>				
692	<b>[OMITTED]</b>				
693	Americold Corporation Bill of Lading (LIGURIA/GRIFF 00216)	A			
694	<b>[OMITTED]</b>				
695	<b>[OMITTED]</b>				
696	<b>[OMITTED]</b>				
697	Declaration of Dr. Kevin Keener in Support of Griffith Laboratories, Inc., dated April 10, 2017	A			
698	Updated Curriculum Vitae of David S. Dickey, Ph.D., as of 04.03.17	A			

Date: April 27, 2017

Respectfully Submitted,

**LIGURIA FOODS, INC.**

By: /s/David J. Ben-Dov

One of Its Attorneys

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**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF IOWA  
CENTRAL DIVISION**

LIGURIA FOODS, INC.,

Plaintiff,

v.

GRIFFITH LABORATORIES, INC.,

Defendant.

Case No. 3:14-CV-03041-MWB

**DEFENDANT'S TRIAL EXHIBIT LIST**

Exhibit Number	Defendant's Exhibits	Categ.	Obj.	Offered	A/ NA
1000.	Letter 11/10/2000 John Randall to Joe McCloskey RE: Formula and Specifications Requested LIGURIA/GRIFF026334-35	A			

Exhibit Number	Defendant's Exhibits	Categ.	Obj.	Offered	A/ NA
1001.	Email Trail 2/18/2009, @ 11:41 a.m. Kent Holt to Thomas Kane RE: Plant Tour - Liguria Foods 2/24/09 GLAB002304-05	A			
1002.	Email 2/26/2009 Don Connor to Patrick Leo RE: Outside Processor GLAB002285	A			
1003.	Email Trail 4/24/2009, @ 9:26 a.m. Kathy Adams to Kent Holt; Kenneth Barnett RE: Pepperoni and Salts GLAB002940-41	A			
1004.	Email Trail 6/24/2009, @ 10:51 a.m. Kathy Adams to Jim Whitham RE: Pepperoni Griffith Review GLAB000927-929	A			
1005.	Email Trail 7/8/2009, @ 3:54 p.m. Kathy Adams to Jim Whitham RE: Oleoresin Paprika GLAB000908-909	A			
1006.	Email 12/11/2009 Don Connor to Kent Holt RE: Spice Orders GLAB002723	A			
1007.	Email Trail 1/21/2010, @ 11:37 a.m. Kent Holt to Jim Whitham RE: Pepperoni GLAB002688-89	A			
1008.	Email Trail 1/25/2010, @ 3:41 p.m. Kent Holt to Kathy Adams RE: Pepperoni GLAB002687	A			
1009.	Email 1/27/2010 Jehan Saulnier to Jim Whitham RE: Liguria Meat Specification LIGURIA/GRIFF015332-35	A			



Exhibit Number	Defendant's Exhibits	Categ.	Obj.	Offered	A/NA
1010.	Email Trail 8/9/2010, @ 3:45 p.m. Kent Holt to Missy Warrant; Eric Werth RE: Liguria Pepperoni Optimize 6-10 GLAB002660-61	A			
1011.	Email 3/29/2011 Kent Holt to Kathy Adams RE: Liguria Pepperoni GLAB002630	A			
1012.	Email Trail 6/29/2011, @ 7:27 a.m. w/attachment Jehan Saulnier to Jim Whitham RE: Info - Dry and Semi LIGURIA/GRIFF017116-126	A			
1013.	Email 7/19/2011 w/attachment Don Connor to Kent Holt RE: Tests GLAB002774	A			
1014.	Email Trail 12/15/2011, @ 3:36 p.m. Don Connor to Donna O'Keefe RE: Purchase Order LIGURIA/GRIFF006689-91	A			
1015.	Email Trail 3/3/2012, @ 12:19 p.m. Jehan Saulnier to Jim Whitham; Gary Pearson; Keith Lathrop; Don Connor RE: Raw Materials Specifications Project LIGURIA/GRIFF018811-12	A			
1016.	Email 3/7/2012 Kent Holt to Don Connor RE: Projects LIGURIA/GRIFF006700-01	A			
1017.	Email Trail 7/12/2012, @ 2:31 p.m. Eric Werth to Kent Holt RE: Canad Pork Prep GLAB001572-75	A			

Exhibit Number	Defendant's Exhibits	Categ.	Obj.	Offered	A/NA
1018.	Email 7/25/2012 @ 3:15 p.m. Jehan Saulnier to Richard Yeh, Prem Singh, Stan Seavey Re: Contact Information & Introductions LIGURIA/GRIFF 026699-700	A			
1019.	Liguria Foods Process Review Proposal July 25, 2012 LIGURIA/GRIFF026787	A			
1020.	Email 9/10/2012 Jehan Saulnier to Lloyd Oshiro; Joe Henry; Mel Carreira RE: Batavia Inventory with Expiration Dates and Cost LIGURIA/GRIFF010442	A			
1021.	Email Trail 10/15/2012, @ 10:51 a.m. w/attachment Don Connor to Kent Holt RE: Spice Contract Bid LIGURIA/GRIFF015024-25	A			
1022.	Email 12/14/2012 Kent Holt to Kathy Adams; Sanny Shah RE: Liguria Seasoning Storage Temps GLAB001503-04	A			
1023.	Email Trail 1/10/2013, @ 9:34 a.m. Sanny Shah to Kent Holt RE: Liguria Seasoning Storage Temps GLAB001497-99	A			
1024.	Email 1/16/2013 w/attachment Kent Holt to JWhitham RE: Pepperoni Color LIGURIA/GRIFF001998	A			
1025.	Email Trail 1/16/2013, @ 8:15 a.m. Travis Wirtz to Bill Shivers RE: Yellowish Pepperoni LIGURIA/GRIFF017159-63	A			

Exhibit Number	Defendant's Exhibits	Categ.	Obj.	Offered	A/ NA
1026.	Email Trail 2/4/2013, @ 3:05 p.m. Don Bernacchi to Kathy Adams; Kent Holt; Tom Kane; Lou Windecker; Missy Warren; Darrell Portz RE: Liguria Pepperoni Analytics GLAB001453-58	A			
1027.	Email 2/5/2013 Prem Singh to JWhitham RE: Questions for you and Stan LIGURIA/GRIFF019912	A			
1028.	Email Trail 2/5/2013, @ 2:46 p.m. JHenry to Alison Hinka RE: Aldi Pepperoni LIGURIA/GRIFF002162-70	A			
1029.	Email Trail 2/5/2013, @ 4:09 p.m. Stan Seavey to Prem Singh; JWhitham RE: Questions for you and Stan LIGURIA/GRIFF018843-45	A			
1030.	Email 2/5/2013 @ 4:09 p.m. Stan Seavey to Prem Singh; JWhitham RE: Questions for you and Stan LIGURIA/GRIFF 015271-73	A			
1031.	Email Trail 2/6/2013, @ 8:29 a.m. Stan Seavey to JWhitham RE: Questions for you and Stan LIGURIA/GRIFF015030-32	A			
1032.	Email Trail 2/6/2013, @ 9:33 a.m. Stan Seavey to JWhitham RE: RE: Questions for you and Stan LIGURIA/GRIFF002182-85	A			
1033.	Email Trail 2/6/2013, @ 2:16 p.m. JWhitman to Kathy Adams; Kent Holt RE: Liguria Pepperoni Analytics GLAB001451-52	A			

Exhibit Number	Defendant's Exhibits	Categ.	Obj.	Offered	A/ NA
1034.	Email Trail 2/7/2013, @ 5:20 p.m. Kathy Adams to JWhitman; Kent Holt RE: Liguria Pepperoni Analyticals GLAB001448-50	A			
1035.	Email Trail 2/8/2013, at 10:53 a.m. DJohnson to JWhitman RE: Antioxidant Levels in Newlywed Pepperoni Spice ADD to COA LIGURIA/GRIFF--2189-90	A			
1036.	Email Trail 2/8/2013, @ 11:41 a.m. Lynda Lathrop to Kathy Adams RE: Updated Liguria Pepperoni Analyticals GLAB001442-43	A			
1037.	Email Trail 2/8/2013, @ 4:21 p.m. Kathy Adams to JWhitman; DConnor; Gpiearson; RE: Liguria Pepperoni Analyticals Glab001440-41	A			
1038.	Email Trail 2/8/2013, @ 4:21 p.m. Kathy Adams to JWhitham; DConnor; GPearson RE: Updated: Liguria Pepperoni Analyticals LIGURIA/GRIFF002020-21	A			
1039.	Email Trail 2/10/2013, @ 9:34 a.m. Prem Singh to Stan Seavey RE: Questions for you and Stan LIGURIA/GRIFF019909-11	A			
1040.	Email Trail 2/11/2013, @ 10:21 a.m. JSaulnier to LCarlson RE: xf beef LIGURIA/GRIFF018846-49	A			
1041.	Email Trail 2/11/2013, @ 2:15 p.m. JHenry to Alison Hinka RE: Aldi Pepperoni LIGURIA/GRIFF002193-2202	A			

Exhibit Number	Defendant's Exhibits	Categ.	Obj.	Offered	A/ NA
1042.	Email Trail 2/12/2013, @ 11:54 a.m. Kathy Adams to JWhitham; Kent Holt RE: Updated: Liguria Pepperoni Analytics LIGURIA/GRIFF005817-19	A			
1043.	Email Trail 2/12/2013, @ 1:18 p.m. Kathy Adams to Kent Holt RE: Updated: Liguria Pepperoni GLAB001435-38	A			
1044.	Email Trail 2/12/2013, @ 5:14 p.m. Stan Seavey to JWhitham; Prem Singh RE: Questions for you and Stan LIGURIA/GRIFF015260-63	A			
1045.	2/12/2013 @ 5:14 pm Seavey Email Liguria/Griff004812-15	A			
1046.	Email Trail 2/13/2013, @ 7:11 a.m. GPearson to KLathrop; DConnor RE: Questions for you and Stan LIGURIA/GRIFF004816-20	A			
1047.	Email Trail 2/13/2013 GLAB001428-34	A			
1048.	Email Trail 2/13/2013, @ 11:35 a.m. Diane Martin to <a href="mailto:nifmarketing@msn.com">nifmarketing@msn.com</a> ; Joe Henry RE: More Bad Pepperoni LIGURIA/GRIFF015035-37	A			
1049.	Email Trail 2/13/2013, @ 2:53 p.m. Sandy Clark to <a href="mailto:nifmarketing@msn.com">nifmarketing@msn.com</a> ; Diane Martin; Liguria Foods RE: More Bad Pepperoni LIGURIA/GRIFF015040-41	A			
1050.	Email Trail 2/13/2013, @ 3:09 p.m. <a href="mailto:nifmarketing@msn.com">nifmarketing@msn.com</a> to Sandy Clark; Diane Martin; Liguria Foods RE: More Bad Pepperoni LIGURIA/GRIFF015044-45	A			

Exhibit Number	Defendant's Exhibits	Categ.	Obj.	Offered	A/NA
1051.	Email 2/13/2013, @ 7:48 a.m. JWhitham to Stan Seavey; Prem Singh RE: Question for you and Stan LIGURIA/GRIFF001459-63	A			
1052.	Email Trail 2/13/2013, @ 9:51 p.m. Kathy Adams to JWhitham RE: Update on Liguria Pepperoni LIGURIA/GRIFF005810-14	A			
1053.	Email Trail 2/18/2013, @ 9:41 a.m. w/attachment Stephen Lowe to Jim Whitham RE: Bad Quality Product LIGURIA/GRIFF002027	A			
1054.	Email Trail 2/20/2013, @ 3:51 p.m. Stan Seavey to JWhitham RE: A good question for you LIGURIA/GRIFF015046-47	A			
1055.	Email Trail 2/20/2013, @ 4:10 p.m. Lou Windecker to JWhitham RE: Any updates on the last samples sent in? LIGURIA/GRIFF002034-36	A			
1056.	Email Trail 2/26/2013 @ 1:38 p.m. Lou Windecker to JWhitham RE: Update on Liguria Pepperoni GLAB001404-08	A			
1057.	Email Trail 2/26/2013, 1:38 p.m. Lou Windecker to JWhitham RE: Update on Liguria Pepperoni LIGURIA/GRIFF006834-36	A			
1058.	Email Trail 3/1/2013, @ 6:39 p.m. JHenry to LOshiro; JSaulnier RE: Greasy Rancid Smelling Pepperoni Complaint LIGURIA/GRIFF018861-64	A			

Exhibit Number	Defendant's Exhibits	Categ.	Obj.	Offered	A/ NA
1059.	Email Trail 3/6/2013, @ 9:50 a.m. Kathy Adams to JWhitham RE: Pepperoni BHA and BHT Testing Comparison LIGURIA/GRIFF002037-38	A			
1060.	Email Trail 3/7/2013, @ 9:54 a.m. Jehan Saulnier to Gary Pearson; Keith Lathrop; Don Connor RE: URGENT: Pepperoni Discoloration Issues LIGURIA/GRIFF014814-16	A			
1061.	Email Trail 3/7/2013, @ 11:09 a.m. Joe Henry to JSaunlnier RE: URGENT: Pepperoni Discoloration Issues - digging out LIGURIA/GRIFF014817-20	A			
1062.	Email Trail 3/8/2013, @ 2:32 p.m. w/attachment Brenda Martin to JWhitham RE: Impact of Solving Issues LIGURIA/GRIFF004821-22	A			
1063.	Email Trail 3/11/2013, @ 3:17 p.m. JWhitham to Kathy Adams; DConnor; GPearson RE: Liguria Issues GLAB001363-65	A			
1064.	Email Trail 3/11/2013, @ 3:24 p.m. Kathy Adams to JWhitham; DConnor; GPearson RE: Liguria Issues GLAB001360-62	A			
1065.	Email Trail 3/11/2013, @ 3:17 p.m. JWhitham to Kathy Adams, DConnor, GPearson RE: Liguria Issues LIGURIA/GRIFF006867-69	A			



Exhibit Number	Defendant's Exhibits	Categ.	Obj.	Offered	A/ NA
1066.	Email Trail 3/12/2013, @ 11:29 a.m. w/attachment Kathy Adams to JWhitham RE: Liguria Issues LIGURIA/GRIFF006897-6901	A			
1067.	Email 3/12/2013 MWilliams to JWhitham RE: Just a thought LIGURIA/GRIFF002214	A			
1068.	Email Trail 3/12/2013, @ 2:39 p.m. Kathy Adams to Lou Windecker RE: Liguria Issues GLAB000526	A			
1069.	Email 3/13/2013 PSimkus to DPyle RE: Complaints Griffith LIGURIA/GRIFF016414	A			
1070.	Email 3/13/2013 Chris Carr to Lou Windecker; Kathy Adams; Missy Warren; Don Bernacchi; Kent Holt; Chris Woods RE: Liguria Pepperoni Situation GLAB001342-57	A			
1071.	Email 3/19/2013, @ 9:20 a.m. Don Bernacchi to Kathy Adams; Chris Carr RE: Liguria Study GLAB000507	A			
1072.	Email 3/20/2013 @ 10:58 a.m. Jim Bacus to Jim Whitham Re: Antioxidants LIGURIA/GRIFF 014391	A			
1073.	Email Trail 3/21/2013 @ 3:12 p.m. JWhitham to JSaulnier, FPearson Re: Griffith Update LIGURIA/GRIFF 001332-36	A			

Exhibit Number	Defendant's Exhibits	Categ.	Obj.	Offered	A/ NA
1074.	Email Trail 3/22/2013, @ 10:53 a.m. Kent Holt to Kerry Fechner; Dan Panico; Donna O'Keefe RE: Liguria GLAB001311-12	A			
1075.	Email 3/22/2013 @ 9:06 a.m. JWhitham to JSaulnier, GPearson Re: Root cause review conducted at Liguria Foods LIGURIA/GRIFF 001337	A			
1076.	Email 3/22/2013 w/attachment Kathy Adams to JWhitman RE: Shelf Life Study Consideration - Finished Pepperoni Made With Booster Pack LIGURIA/GRIFF006917	A			
1077.	Email Trail 3/27/2013, @ 3:39 p.m. RMaehler to JWhitham RE: I have a good question for you LIGURIA/GRIFF024657	A			
1078.	Email Trail 3/27/2013, @ 4:07 p.m. RMaehler to JWhitham RE: I have a good question for you LIGURIA/GRIFF015061-62	A			
1079.	Email Trail 3/28/2013, @ 10:10 a.m. JWhitham to DConnor; JSaulnier RE: Rosemary Question LIGURIA/GRIFF002223-30	A			
1080.	Email 4/1/2013, @ 4:52 p.m. DConnor to LOShiro; JSaulnier; GPearson RE: Complaint LIGURIA/GRIFF018869-70	A			
1081.	Email Trail 4/2/2013, @ 8:48 a.m. RMaehler to JWhitham RE: I have a good question for you LIGURIA/GRIFF015067-69	A			

Exhibit Number	Defendant's Exhibits	Categ.	Obj.	Offered	A/ NA
1082.	Email Trail 4/8/2013, @ 1:08 p.m. w/attachment JSaulnier to GPearson; JWhitham RE: Pepperoni Formula History LIGURIA/GRIFF005632	A			
1083.	Email Trail 4/9/2013, @ 9:20 a.m. DConnor to JSaulnier RE: Message from Liguria Foods regarding Travis Krause with Trilogy Spice Extracts, Inc. LIGURIA/GRIFF024964	A			
1084.	Email Trail 4/9/2013, @ 4:45 p.m. MWilliams to DConnor RE: Liquid Spice LIGURIA/GRIFF024661-62	A			
1085.	Email Trail 4/9/2013, @ 6:56 p.m. JSaulnier to DConnor RE: Anti-Oxidant Booster LIGURIA/GRIFF015817-18	A			
1086.	Email Trail 4/16/2013, @ 12:04 p.m. Kent Holt to JSaulnier RE: Griffith Letter & Rosemary Spec GLAB001246-54	A			
1087.	Email Trail 4/16/2013, @ 12:30 p.m. Don Connor to Jehan Saulnier; Gary Pearson; Jim Whitham RE: Griffith Letter & Rosemary Spec LIGURIA/GRIFF018871-72	A			
1088.	Email Trail 4/16/2013, @ 5:54 p.m. Travis Krause to Gpearson; JWhitham; DConnor RE: Trilogy Follow-Up LIGURIA/GRIFF002231-32	A			
1089.	Email Trail 4/17/2013, @ 11:20 a.m. JSaulnier to JHenry RE: PFS Inventory Position LIGURIA/GRIFF024667-68	A			

Exhibit Number	Defendant's Exhibits	Categ.	Obj.	Offered	A/NA
1090.	Email 4/18/2013 JSaulnier to JWhitham; GPearson; DConnor RE: Griffith Follow-Up - DRAFT - 041913 - Need Input Back By Friday LIGURIA/GRIFF005684-85	A			
1091.	Email Trail 4/18/2013 @ 10:22 a.m. Andy Abromonis to Missy Warren RE: Rancimat Testing GLAB000244-45	A			
1092.	Email Trail 4/19/2013, @ 1:45 p.m. JSaulnier to Kent Holt; Chris Woods; JWhitham; GPearson; DConnor RE: Griffith Letter & Rosemary Spec LIGURIA/GRIFF006974-76	A			
1093.	Email Trail 4/19/2013, @ 2:08 p.m. w/attachment Chris Woods to JSaulnier; Kent Holt RE: Griffith Letter & Rosemary Spec LIGURIA/GRIFF005691-94	A			
1094.	Letter 4/26/2013 Darrell Portz to Jehan Saulnier RE: Summarized responses to inquiry made on April 19, 2013 GLAB001233-1238	A			
1095.	Letter 4/29/2013 Roger Maehler [Newly Weds Foods] to Jehan Saulnier LIGURIA/GRIFF015377-79	A			
1096.	Email Trail 4/30/2013 @ 8:18 a.m. JSaulnier to RMaehler RE: questions answered – follow up LIGURIA/GRIFF015386-88	A			

Exhibit Number	Defendant's Exhibits	Categ.	Obj.	Offered	A/ NA
1097.	Email Trail 4/30/2013 @ 12:09 p.m. w/attachment Darrell Portz to Kent Holt; Lou Windecker; Chris Woods; jbacus@tingsol.com RE: FW: Griffith Discussion w/Liguria GLAB001228-38	A			
1098.	Email Trail 4/30/2013 @ 7:34 a.m. JSaulnier to JWhitham Re: Sam's [Club] LIGURIA/GRIFF 004956-57	A			
1099.	Email Trail 5/2/2013 @ 9:59 a.m. JSaulnier to JWhitham, JHenry, GPearson RE: Inventory Aging LIGURIA/GRIFF024683-84	A			
1100.	Email Trail 5/2/2013 @ 4:54 p.m. JSaulnier to Mark Williams RE: questions answered – follow up LIGURIA/GRIFF002250-52	A			
1101.	Email Trail 5/4/2013 @ 1:12 p.m. RMaehler to JSaulnier RE: questions answered – follow up LIGURIA/GRIFF002256-60	A			
1102.	Memo 5/7/2013 Don Bernacchi to Andy Abromonis Re: Rancimat Testing GLAB000306-07	A			
1103.	Email 5/11/2013 @ 4:05 p.m. JSaulnier to PSimkus RE: FW: Situation Update LIGURIA/GRIFF024689-90	A			
1104.	Email 5/12/2013 w/attachment LIGURIA/GRIFF014980-81	A			
1105.	Email 5/13/2013 @ 11:41 a.m. Travis Krause to jchristopherson RE: Travis Krause contact info LIGURIA/GRIFF002264	A			

Exhibit Number	Defendant's Exhibits	Categ.	Obj.	Offered	A/ NA
1106.	Email Trail 5/14/2013 @ 4:46 p.m. Kent Holt to Chris Woods; Darrell Portz RE: Liguria Foods-Can I Please Get Your Feedback? GLAB001195-96	A			
1107.	Email Trail 5/15/2013 @ 9:14 a.m. Lou Windecker to Darrell Portz RE: Liguria Questions GLAB001193-94	A			
1108.	Email Trail 5/16/2013 @ 10:04 a.m. jchristopherson to JWhitham RE: Additional Rancimat Testing at Griffith LIGURIA/GRIFF002380-81	A			
1109.	Email Trail 5/16/2013 @ 2:35 p.m. w/attachment Darrell Portz to Lou Windecker; Lynda Lathrop; Andy Abromonis; Don Bernacchi RE: FW: Additional testing for Rancimat GLAB001190-92	A			
1110.	Email 5/17/2013 @ 4:44 p.m. w/attachment JSaulnier to JWhitham; PSimkus; JHenry RE: Sams Issued Letters LIGURIA/GRIFF002385	A			
1111.	Email 5/18/2013 @ 2:10 p.m. w/attachment JSaulnier to JWhitham LIGURIA/GRIFF002393-2397	A			
1112.	Email 5/21/2013 @ 4:30 p.m. JSaulnier to JWhitham RE: Sam's - Sam's Club & Liguria Foods, Inc.; Memo-Jim Whitham to Jehan Saulnier; Memo-Jim Whitham to Jehan Saulnier; Letter @ 5/17/2013--Michael Stewart to Jehan Saulnier; Letter @ 5/17/2013--Neil Tarallo to Jehan LIGURIA/GRIFF002407-20	A			

Exhibit Number	Defendant's Exhibits	Categ.	Obj.	Offered	A/NA
1113.	Email 5/23/2013 @ 7:13 a.m. w/attachment JSaulnier to JWhitham RE: FW: Liguria Issue Resolution LIGURIA/GRIFF002426-27	A			
1114.	Email 5/29/2013 @ 2:51 p.m. w/attachment Sanny Shah to JWhitham RE: Updated BHA - BHT LIGURIA/GRIFF007054-55	A			
1115.	Email 6/3/2013 @ 11:02 a.m. w/attachment JSaulnier to JWhitham, jchristopherson, GPearson, DConnor RE: Spice Mixing Consultant - Peter Clark LIGURIA/GRIFF015859-74	A			
1116.	Email 6/3/2013 @ 11:15 a.m. w/attachment JSaulnier to jpc3@att.net LIGURIA/GRIFF014331-32	A			
1117.	Email 6/6/2013 @ 3:22 p.m. w/attachment JSaulnier to jpc3@att.net LIGURIA/GRIFF005716	A			
1118.	Email Trail 6/7/2013 @ 8:21 a.m. Don Bernacchi to Lou Windecker Re: MaxJob#: B379227, Att: Andy Abromonis, File: B379227-R2013-06- 06_14-55-20_R006.pdf; attached ... GLAB000191-93	A			
1119.	Email Trail 6/13/2013 @ 6:03 a.m. w/attachment DConnor to JWhitham RE: export pepperoni spice LIGURIA/GRIFF004366-68	A			



Exhibit Number	Defendant's Exhibits	Categ.	Obj.	Offered	A/ NA
1120.	Email Trail 6/26/2013 @ 1:56 p.m. w/attachment <a href="mailto:jpc3@att.net">jpc3@att.net</a> to JWhitham RE: draft report LIGURIA/GRIFF015178-84	A			
1121.	Email 6/26/2013 @ 2:21 p.m. w/attachment <a href="mailto:jpc3@att.net">Jpc3@att.net</a> to JWhitham, jchristopherson, jsaulnier,psimkus RE: visit report – Visit Report LIGURIA/GRIFF015185-89	A			
1122.	Email Trail 6/26/2013 @ 2:31 p.m. w/attachment <a href="mailto:jpc3@att.net">jpc3@att.net</a> to jchristopherson; PSimkus; JSaulnier RE: Fw: visit report LIGURIA/GRIFF015190-94	A			
1123.	Email 6/29/2013 @ 7:09 pm Darrell Portz to Kent Holt, Chris Woods, Don Bernacchi, Lou Windecker Re: Rancimat Testing Summary GLAB001113-14	A			
1124.	Email Trail 7/9/2013 @ 8:15 a.m. w/attach Darrell Portz to JWhitham RE: In Prep for Your Visit LIGURIA/GRIFF002050-51	A			
1125.	Email 7/12/2013 @ 6:17 p.m. w/attachment <a href="mailto:jpc3@att.net">jpc3@att.net</a> to JWhitham RE: trip report draft LIGURIA/GRIFF015198	A			
1126.	Email Trail 7/15/2013 @ 9:54 a.m. w/attachment Jim Bacus to JWhitham; jchristopherson RE: Shelf Life –Natural-Organic LIGURIA/GRIFF004415-47	A			

Exhibit Number	Defendant's Exhibits	Categ.	Obj.	Offered	A/NA
1127.	Email Trail 7/17/2013 @ 10:24 a.m. w/attachment KMadsen to Kent Holt RE: Pepperoni Color GLAB001487-93	A			
1128.	Email Trail 7/22/2013 @ 8:20 a.m. w/attachment Lou Windecker to JWhitham; Kathy Adams RE: Can you run some Antiosidant level on a few samples for us? LIGURIA/GRIFF002131-32	A			
1129.	Email Trail 7/27/2013 @ 10:34 a.m. w/attachment JWhitham to JSaulnier RE: Peter Clark report LIGURIA/GRIFF015205	A			
1130.	Email 8/5/2013 @ 6:37 a.m. w/attachment JWhitham to jchristopherson; JSaulnier; JHenry; KLathrop; LOshiro RE: Updated Customer Complaint Log W/E 08/04/2013 LIGURIA/GRIFF019765	A			
1131.	Email 8/5/2013 @ 12:41 p.m. w/attachment Travis.Krause to jchristopherson RE: Kemin Food Technologies info LIGURIA/GRIFF015208	A			
1132.	Email Trail 8/5/2013 @ 12:56 p.m. w/attachment jchristopherson to JSaulnier; JWhitham RE: FW: Kemin Food Technologies info LIGURIA/GRIFF004467-68	A			

Exhibit Number	Defendant's Exhibits	Categ.	Obj.	Offered	A/NA
1133.	Email Trail 8/12/2013 @ 11:28 a.m. DConnor to PSimkus RE: FW: Updated: Liguria Pepperoni Analytics LIGURIA/GRIFF002144-46	A			
1134.	Email Trail 8/13/2013 @ 7:34 a.m. w/attachment JWhitham to JMeuschke RE: Orion Food Systems-Hot Stuff Pizza Forms LIGURIA/GRIFF024917-32; 024935-48	A			
1135.	Email 8/19/2013 @ 7:16 a.m. w/attachment JWhitham to jchristopherson; JSaunier; JHenry; KLathrop; LOshiro; DBrock RE: Updated Customer Complaint W/E 08/18/2013 LIGURIA/GRIFF005107	A			
1136.	Email 8/26/2013 @ 6:32 a.m. w/attachment JWhitham to jchristopherson; JSaulnier; JHenry; LOshiro; DBrock; KLathrop; PROth RE: Updated Customer Complaint Log LIGURIA/GRIFF020209	A			
1137.	Email 10/30/2013 @ 11:56 a.m. w/attachment JSaulnier to PSimkus RE: CLIENT CONFIDENTIAL:Rough Time Line of Events_GRIFFITH LIGURIA/GRIFF022027-28	A			
1138.	Email Trail 10/30/2013 @ 3:32 p.m. JSaulnier to PSimkus; jchristopherson RE: CLIENT CONFIDENTIAL-Next Steps-Griffith LIGURIA/GRIFF018807-10	A			

Exhibit Number	Defendant's Exhibits	Categ.	Obj.	Offered	A/ NA
1139.	Email Trail 10/30/2013 @ 3:32 p.m. JSaulnier to PSimkus; jchristopherson RE: CLIENT CONFIDENTIAL-Next Steps-Griffith LIGURIA/GRIFF001920-23	A			
1140.	Email 11/11/2013 @ 3:02 p.m. Chris Woods to JSaulnier RE: Meeting Confirmation GLAB001024	A			
1141.	Email 11/20/2013 @ 5:06 p.m. w/attachments JSaulnier to lchambers; PSimkus RE: CLIENT CONFIDENTIAL: Rough Time Line of Events_GRIFFITH-v2 LIGURIA/GRIFF015919	A			
1142.	Email 11/29/2013 @ 2:28 p.m. w/attachment lchambers to PSimkus; jchristopherson RE: Griffith Spice Issue.pptx LIGURIA/GRIFF014531	A			
1143.	Email 11/30/2013 @ 10:05 a.m. jchristopherson to lchambers; PSimkus RE: Griffith Spice Issues.pptx LIGURIA/GRIFF004492-93	A			
1144.	Email 12/3/2013 @ 10:23 a.m. Chris Woods to Lance Chambers RE: Meeting Information GLAB001019-20	A			
1145.	Affidavit of Jehan Saulnier	A			
1146.	Supplemental Affidavit of Jehan Saulnier	A			
1147.	Summary and Recommendations from Plant Process Review	B	FRE 403		
1148.	Liguria Foods Website Printouts	A			

Exhibit Number	Defendant's Exhibits	Categ.	Obj.	Offered	A/NA
1149.	Liguria Meeting with Griffith 12/6/2013 LIGURIA/GRIFF001301-1451	A			
1150.	Internal Control Procedures - Document Management Policy 2/1/2013 LIGURIA/GRIFF002464-66	A			
1151.	Internal Control Procedures - Product Traceability/Recall Policy 2/1/2013 LIGURIA/GRIFF002469-78	A			
1152.	Invoices LIGURIA/GRIFF000367-92	A			
1153.	Expert Report of Dr. Joseph G. Sebranek, Ph.D. (November 29, 2016)	A			
1154.	Expert Report of Francis X. Burns (September 6, 2016)	A			
1155.	Rebuttal Report of John W. Carson, Ph.D. (November 29, 2016)]	A			
1156.	Dr. John W. Carson, Curriculum Vitae	A			
1157.	Summary and Recommendations from Plant Process Review Liguria Foods-September 11-14, 2012 LIGURIA/GRIFF026803-07	B	FRE 403		
1158.	Summary and Recommendations from Plant Process Review (with handwritten notes) Liguria Foods-September 11-14, 2012 LIGURIA/GRIFF026808-12	B	FRE 403		
1159.	Liguria Foods, Inc. Product & Customer Complaint Form LIGURIA/GRIFF000586-000596	A			
1160.	Supplemental Expert Report of Dr. Joseph G. Sebranek, Ph.D. (February 4, 2017)	A			

Exhibit Number	Defendant's Exhibits	Categ.	Obj.	Offered	A/ NA
1161.	"Prem 1" Observations and Recommendations LIGURIA/GRIFF026814-16	B	FRE 403		
1162.	"Prem -- P2" Observation and Recommendations-Liguria Sept 11-14 2012 LIGURIA/GRIFF026817-33	B	FRE 403		
1163.	Process Control Technician Description LIGURIA/GRIFF026834-35	A			
1164.	Documents produced by Stan Seavey to Liguria Foods SEAVEY000001-47	B	FRE 403		
1165.	Group Exhibit -- Sales Order Packing List Griffith Laboratories, USA-Liguria Foods LIGURIA/GRIFF0 00370-475 (non-sequential)	A			
1166.	Article-- <i>The Influence of Dried Distillers' Grains on Carcass Fat in Swine</i> by Micky A. Latour and A. P. Schinckel LIGURIA/GRIFF 001316-17	A			
1167.	Group Exhibit--Liguria Foods Complaint Logs A 2008 Complaint Log B 2009 Complaint Log C 2010 Complaint Log D 2011 Complaint Log E 2012 Complaint Log F 2013 Complaint Log  A LIGURIA/GRIFF024024-27 B LIGURIA/GRIFF024018-23 C LIGURIA/GRIFF024008-17 D LIGURIA/GRIFF023990-024007 E LIGURIA/GRIFF023942-89 F LIGURIA/GRIFF 023894-023941	A			
1168.	Kathy Adams' Traceability Table GLAB001271-75	A			

Exhibit Number	Defendant's Exhibits	Categ.	Obj.	Offered	A/NA
1169.	Email Trail 7/16/2013 @ 3:34 p.m. w/Attachment Jim Bacus to jchristopherson RE: Organic Info LIGURIA/GRIFF 004451-55	A			
1170.	Email 8/3/2013 @ 8:45 a.m. w/Attachment JSaulnier to jchristopherson; JWhitham RE: FW: Seasoning Report LIGURIA/GRIFF 014910-22	A			
1171.	Email Trail 8/5/2013 @ 5:17 a.m. JSaulnier to James N Bacus; JWhitham RE: Griffith Specifications LIGURIA/GRIFF 015432-34	A			
1172.	Email Trail 8/5/2013 @ 5:18 a.m. JSaulnier to JWhitham; jchristopherson RE: Griffith Specifications LIGURIA/GRIFF 015435-36	A			
1173.	6/13/14 Liguria internal email, D. Iverson – J. Christopherson re: Complaint Analysis & attachment (LIGURIA/GRIFF024648-24652)	A			



Dated: April 28, 2017

Respectfully submitted:

**GRIFFITH LABORATORIES, INC.**

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One of its Attorneys

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